

U.S. ENVIRONMENTAL PROTECTION AGENCY REVIEW REPORT ON  
THE DRAFT ENVIRONMENTAL IMPACT STATEMENT AND  
PROPOSED LAND AND RESOURCE MANAGEMENT PLAN FOR  
THE DISCHUTTS NATIONAL FOREST, OREGON

Draft Environmental Impact Statement

Resource Inventory

The introduction indicates that a new resource inventory is being prepared. The updated inventory should have been completed prior to the preparation of the DEIS and Plan. An updated resource inventory could significantly change many of the actions proposed in the DEIS and Plan.

Forest Budget

The preferred Alternative 1 requires a 16 percent increase in budget. This appears to be an optimistic expectation. It is difficult to determine what happens to the implementation of this alternative without the needed budget increase. The Final EIS should summarize how tradeoffs in projected goals and adjustments will be made in the absence of the 16 percent increase in budget.

Water Quality and Monitoring

The water quality and riparian areas management discussions in the DEIS and Plan lack sufficient detail. There are general statements in both DEIS and Plan documents indicating that water quality problems are few, and riparian areas are, for the most part, in good condition. There are no water quality data summaries, documentation or resource inventories to support the general statements in the DEIS and Plan.

The Final EIS should provide additional information to compare the water quality effects of the alternatives. There seem to be enough differences to warrant such an evaluation. There is a 43% difference between the total timber harvesting acreage of Alternatives A and C (Page 74) and a 51% difference in the volume of total timber harvest (Page 104). The soil risk index varies considerably among alternatives (Page 93). Finally, permitted grazing is increased over current conditions (Page 96). To depict the differences, the number of stream miles or number of lakes with resident fishery habitat affected by each alternative from timber and grazing should be given. Other means to compare each alternative might include a list of acreages for timber harvest areas and grazing allotments in watersheds where water quality problems have been previously identified. Acreages should also be provided for watersheds with sensitive beneficial uses like water supply, resident fish or recreation.

The supplemental water quality monitoring information, not part of the DEIS and Plan that we have received, indicates that water quality on the DNF has been monitored since the 1960's, with an extensive nonpoint source monitoring program on each district since the 1970's. A summary of the results of this monitoring should be presented in the Final EIS and Plan to support the general statements about water quality on the DNF. The available data apparently characterize the stream conditions on the DNF and illustrate seasonal variability.

This water quality monitoring information identifies water quality problems for Davis Lake, Suttle Lake, Link Creek and Blue Lake. None of these water quality problems or any proposed solutions are discussed in the DEIS or Plan. It is difficult to determine the magnitude of these water quality problems, since no data was available for review. This water quality problem assessment information along with summary data and interpretations should be included in the Final EIS and Plan.

The Final EIS should include additional information about existing water quality and fish habitat conditions. The conditions should be discussed in the context of trends and implications for the proposed alternative. The stream temperature violations of existing water quality standards should be discussed in the context of affected management areas and mitigation measures to be used to reduce impacts.

The discussion of best management practices (BMPs) in the Environmental Consequences section is difficult to interpret. It is not clear whether the BMPs referenced are in the Standards and Guidelines, Forest Service Manuals or some other source. The BMP discussion should recognize the Oregon Forest Practices Act and Rules. The process the DNF will use to comply with or exceed the state's requirements for forest practices should be included. It is important for the DNF Plan to recognize and be consistent with Oregon's adopted Water Quality Management Plan for Forest Practices required by the Clean Water Act.

The management of riparian areas should be discussed in more detail in the Final EIS and Plan. The general discussion in the Environmental Consequences section indicates that, "BMPs will be used to maintain streamside vegetation and channel stability." It is not clear whether this reference is to the state adopted BMPs or practices in addition to these requirements. It is also not clear if alternatives were analyzed which simply deferred riparian areas, resident fishery habitat, or water supply watershed from timber management.

Domestic Water Supplies

The Bend Water Supply is one of the special management areas identified in the DEIS and Plan. There are other communities which depend on the DNF for their water supply. The Final EIS should identify water supply intake locations, and the existence of any other special or protected beneficial uses. The Final Plan should then apply management standards which afford the necessary protection to the watersheds in which those uses occur.

It is not clear what levels of protection will be provided for water supply watersheds for the City of Sisters and Mount Bachelor ski areas. The water supply protection discussion in the Plan is limited to the City of Bend.

The Forest Plan should identify public supply watersheds and include management prescriptions and standards which comply with state water quality standards for both community and non-community water use. Management should be coordinated with and reviewed by the water users and the state agency responsible for public water supply standards. Since the effects of activities on all drinking water supplies have not been assessed in the DEIS and Plan, we have the following recommendations:

1. Present background information pertaining to drinking water supplies, including

Name, location, size, source, and treatment of each system

- Historical water quality information (ambient and drinking water). This would be available from the municipalities, local and state health departments, and the U.S. Geologic Survey
- Past and present watershed usage, including whether the watershed is open or closed to public access
- Whether waterborne disease occurrences have been associated with these supplies
- Reference to applicable federal, state or local regulations regarding ambient and drinking water quality

2. Identify watersheds or areas within watersheds which are particularly sensitive to activities which might have a detrimental effect on water supplies. Sensitive areas may be defined by such factors as the physical features of the watershed, the number of water users in the watershed, the type of water treatment employed, the location of water intakes, and past history of water quality problems

3. Identify activities which have the potential to degrade potable water quality. These would include such things as timber harvesting, road construction, mining, livestock grazing, pesticide usage, recreational development, etc. Increased sediment input as a result of timber harvesting and road construction, and the effects of livestock grazing, are of particular concern. The cost and effectiveness of treatment and disinfection (e.g., for *Giardia lamblia*) are greatly compromised as turbidity increases. Grazing along streambanks can cause an increase in turbidity as well as serious bacterial contamination.

4. Assess the impact on the watershed and municipalities of planned forest activities. Quantification of the expected impact is desirable; however, we realize that this may not always be possible with the data available.

5. Discuss the process the DNI will use for protecting domestic water supplies. It would be desirable to designate domestic water supply watersheds as separate management areas. For these areas appropriate management goals and standards should be consistent with the Forest Service Manual. Municipal watershed management plans should be cited or developed which allow the water users, the land management agency, and the state agency responsible for public water supply standards to cooperatively monitor the watershed.

These recommendations apply primarily to surface water supplies. There may also be effects on ground-water supplies. The potential impact of the Plan on drinking water aquifers should be considered.

To determine how effective the planning and management of the DNI will be in protecting water quality, it is essential that a monitoring component be included. Such a monitoring program should address both ambient water quality and drinking water quality. Sampling parameters for water systems would include those specified in the National Interim Primary Drinking Water Regulations, and for ambient water quality would include turbidity and total fecal coliforms. Site specific parameters may also be valuable additions, for example, pH where acid mine drainage is a concern. Monitoring information will not only provide data about effectiveness of management actions, but will also create a reference base for future management decisions regarding appropriate activities in municipal watersheds.

## Air Quality

Initially 75,000 cords of firewood would be made available for personal use firewood in the Plan. There has been a 1,000% increase in firewood permits in the past 13 years. The DLIS identifies wood stove pollution problems in the winter (Page 112). The effects of wood smoke appear to be viewed primarily as a visibility issue.

Smoke particles emitted from incomplete combustion of wood are small enough to penetrate deep into the lower respiratory tract when inhaled, these particles may have relatively high concentrations of compounds that are known and suspected carcinogens. The DLIS and Plan should identify the health impacts of wood smoke.

Forest land managers that provide firewood have a unique opportunity to educate the public regarding fuelwood use and air pollution through the permit process. Pamphlets discussing the association between wood stoves, air pollution, and health concerns, or providing tips on efficient wood stove operation, for example, could be distributed with fuelwood permits. If appropriate literature is not readily available, we would be happy to provide examples that are being used elsewhere.

## Specific Comments DLIS

Relationship of Issues, Page 7 This section seems to indicate that industry may use a large amount of the lodgepole pine surplus. This suggests a number of questions regarding secondary economic and environmental impacts of many of the alternatives. What kinds of existing or new industry could take advantage of this surplus? Are there significant environmental impacts associated with these industries? Are there adverse economic effects from decreasing lodgepole pine supplies in future decades? Would there be pressure to sustain a new lodgepole pine dependent industry in the future that would perpetuate departure from sustained yields? These questions should be evaluated in some detail in the Final DLIS.

Issues and Concerns, Page 67 The issues related to the upgrading of the four roads are difficult to interpret without additional information on road design and location in relation to sensitive resources. Are there secondary development impacts from improving these roads on or off the DNI? This should be evaluated. It is especially difficult to evaluate or assess potential water quality impacts without more information.

Issues and Concerns, Page 73 Specific decisions regarding the geothermal leasing of an area may need an EIS rather than an EA. This discussion appears to suggest that, if the preferred Alternative 1 allows leasing, no additional EISs on leasing will be necessary. The DLIS and Plan are too general to exclude the need for EISs on specific projects that have the potential to significantly impact the environment.

Resource Outputs, Environmental Effects, Activities and Costs, Table B-2a, Pages 90-95 The table primarily includes projected outputs rather than environmental effects, as indicated in the title.

This table indicates that limited data are available on fish habitat. Will additional fish habitat information be made available through the resource inventory referenced earlier? It is important to know where the high quality habitats are and where they may be affected by forest management practices.

The type of fuel treatment projected should be explained. An increase of 12 thousand additional acres for treatment could be significant if prescribed burning is planned. The air quality impacts could be more significant than temporary and localized as indicated.

It is not clear why grazing output numbers for each alternative are not included in the table. If they are intended to be the same as for timber harvest, this should be indicated.

Timber, Page 143 About 1,500,000 acres or 71% of the DNF is suitable for timber production, yet 1,272,000 acres are currently considered suitable for timber harvesting. The 222,000 acres difference should be explained.

Soils, Page 177 Considering the permeability of the soils it would seem to indicate that groundwater is vulnerable. What is the quality of groundwater on the DNF? Have there been instances of contamination?

Water Quality, Page 178 The water quality standards for temperature have been exceeded on the DNF. Where are these problems occurring? Are there effects on the resident fishery? Will they be corrected?

General, Page 183 The DNF states, "They [standards and guidelines] provide the necessary environmental protection and mitigation measures for all Alternatives." In our view the standards and guidelines are not written specifically enough to verify that environmental protection will be provided.

Geothermal Consequences on Resources, Page 214 While it is understood that the specifics of a particular geothermal lease are not known at this time, the Final EIS should be more specific concerning the sensitive resources that exist in the area proposed for leasing. We would be especially concerned about any effects on groundwater.

Visual Quality, Page 116 Pipelines, powerlines, and roads can also have an effect on visual quality. Are there opportunities to use existing rights of way?

Noise, Page 218 Another sensitive noise receptor would be recreation users.

## Proposed Land and Resource Management Plan

### Monitoring and Evaluation

Monitoring and evaluation discussions are included in several parts of the DNFIS and Plan. The purpose of the Forest Plan is to "establish the monitoring and evaluation requirements needed to ensure that the direction is carried out and to determine how well outputs and effects were predicted." This important purpose statement is not reflected in subsequent sections of the Plan.

The monitoring and evaluation requirements are not clearly spelled out in the Plan. It is recognized that a separate and detailed monitoring plan document may be prepared for the Deschutes National Forest (DNF). However, the Forest Plan should include: (1) more definitive goals and objectives for the proposed monitoring, (2) types of surveys and general frequency, and (3) approaches for using monitoring data and information gathered to evaluate actions and modify activities where necessary to achieve desired environmental protection results. The Final EIS and Plan should be expanded to address these issues. This is necessary to provide the policy and program direction for an effective monitoring plan.

The adequacy of the monitoring plan to assess environmental impacts, and methods to ensure that the assessments are used in management decisions, are key factors in EPA's ability to evaluate the adequacy of Forest Plans and EISs. The monitoring plan together with the standards and guidelines should serve to highlight how the plan will be implemented. The Final Plan should clearly outline how monitoring will be carried out such that mid-course corrections can be made in forest management. This serves as a system of accountability, reduces anxiety for any uncertainties in predicting plan impacts, and makes it clear to the public how the plan will be implemented.

Monitoring Program Guidelines (Table 5-1, Page 119) should include outputs, products, or reports for the monitoring activities. The table indicates that many of the activities will be reported on annually. These annual reports would provide a decision document for DNF managers and for interested and affected groups.

### Standards and Guidelines Applicable to Ground Disturbing and Vegetative Manipulation Activities (Category II)

Most of the standards and guidelines are not as specific as they should be to serve as quantifiable measures of the application of management prescriptions. It is recognized that the Forest Service Manuals and other guidance will provide additional details on many of the activities. However, the standards and guidelines in the DNF Plan should be specific enough to be measurable or to evaluate compliance. We view a standard as a level of attainment. When implementing the Plan monitoring would determine whether this level has been achieved.

It is especially important for the Category II Standards and Guidelines to be strengthened to include more operational requirements and measurable criteria, since they directly affect water quality and beneficial uses. The requirements for any vegetative management within the Streamside Management Unit (SMU) should be expanded to address management activities in SMUs, such as: (1) protection from burning, (2) restrictions on the operation of ground equipment, (3) full suspension of logs during yarding across the riparian zone, and (4) other measures needed to protect the riparian zone. The Report of the Riparian Habitat Task Force, Oregon Departments of Forestry and Fish and Wildlife, 1983 has a good summary of forest practices recommended in riparian ecosystems.

## Minerals

The general standards and guidelines should be identified that will be used in the forest's evaluation to determine if gravel or hardrock will be sold in the public interest. These criteria could assist in assessing the potential environmental impacts from these activities. With the large number of material sources, decisions on developing additional sources could have significant water quality impacts.

The standards and guidelines for minerals should include the broad water quality monitoring requirements for sites with the potential to affect water quality and beneficial uses. Water quality monitoring data may be needed to ensure compliance with the minerals management plan. The requirement to prepare a management plan for each developed mineral source is good, and should be effective in reducing water quality impacts.

## Specific Comments on Plan

Resource Supply Conditions, Page 8: The list of legal requirements should also include those for air and water quality.

Wildlife, Page 12: The relationship of a supply of 33,500 mule deer and a population of 20,300 mule deer (Page 11) should be clarified.

Water, Page 22: We would like to review the water quality monitoring program that is referenced here.

Proposed Outputs, Page 23: The concept of a 10 percent change in appropriated budgets or personnel for adjustments in outputs is important. It is not clear whether this is the point at which the Plan will be revised, or only evaluated to determine the need for revisions. It is also not clear whether the evaluations will be done annually or over some other time frame.

Table 4-1, Average Annual Outputs, Pages 24-26: It would be helpful in understanding the table to include historic or recently programmed levels for the outputs. This would provide a better context to interpret the planned and potential outputs.

Resource Summaries, Page 30: The reference to the Chief's revised policy regarding growth dated March 31, 1981, cannot be understood without a copy of the policy or additional discussion.

Luelwood, Page 45: We would suggest that a standard be added which would use the fuelwood program as one of the means to educate the public on methods to minimize air pollution on fuelwood use.

Streamside Management Units (SMU's) and Fish Habitat, Page 50: The standard states, "For those projects which could affect water quality..." The plan should explain specifically how these projects will be selected. The stream classification system should be explained. An additional item "e" should be added for objectives which reference beneficial water uses such as fish habitat, recreation, water supply, etc. Tree stands within SMU's "will" (rather than should) be managed to maintain the vegetative characteristics needed for water quality and fish habitat protection. In item "c" an explanation of how sufficient amounts of ground cover will be determined should be included.

Riparian Areas, Transportation, Page 52: Roads through high water table areas should be the exception rather than the general rule as implied in these standards and guidelines. Roads and trails should not alter the flow characteristics, nor adversely affect ground-water quality. Landings that could or are affecting water quality must be removed or modified. Road maintenance should be preventative and not rely on weather forecasts. "Additional maintenance" should be explained.

Sewage Disposal, Page 53: There should be state and county requirements for the disposal of sewage. Compliance with these regulatory requirements should be included as a standard.

Soils, Page 54: The Final Plan should provide support for the 20% soil compaction standard.

Soil Mass Wasting, Page 54: This standard should be reworded so that one knows when it has been met. How is increased potential for mass wasting determined? How much of an increase is significant?

Non-Recreation Permits, Page 61: Will Federal Energy Regulatory Commission license applications and permits be reviewed by DNR? Will the "environmental analysis" referenced be part of a special use permit?

Energy Resources - Oil, Gas, and Geothermal, Page 64: It may be appropriate to include specific noise level standards in decibels for geothermal development near sensitive receptors, i.e. recreation areas, residential areas, etc. We would concur that geothermal leasing should not occur in the Newberry Crater.

Minerals - Common Mineral Materials, Item 4, Page 67: The source plan "will" (rather than should) include the information listed in a through g. These should be requirements rather than options. Item g should include "mitigation" and reclamation requirements, especially a stormwater runoff control plan.

Management Areas and Prescriptions, Page 69: It is not clear what happens if cumulative modifications of prescriptions exceed five percent of the total acres during the life of the Plan. The discussion appears to indicate that boundary adjustments that change acreages by more than five percent will require an environmental impact statement under the NEPA process. The process to be used in boundary adjustments should be clarified in the Final Plan.

Timber, Page 70: Unneeded roads and skid trails should be identified and the process that will be used for their reclamation should be included in the Final Plan.

Management Area I (Special Interest Areas), Page 70: Range or domestic livestock grazing appears to be in direct conflict with the goal statement to "preserve and provide interpretations of these unique areas." It is difficult to understand how structural range improvements and vegetative manipulations can be permitted and still maintain the "natural appearance" of the area.

Management Area 10 (Bend Municipal Watershed), Page 101: Standards and Guidelines (Category III) should be included in the Plan for the Bend Municipal Watershed Special Forest Use. The standards and guidelines criteria should be tied specifically to the items listed in (1) through (5) for the Timber Prescription. For example, (a) any timber management will be designed with the goal of not increasing annual flow by a certain percentage, or (b) impacts to soil and water will be monitored both instream and on land during any timber management activities. It would be easier to evaluate compliance with these type requirements rather than the general prescriptions in the Proposed Plan.

Monitoring - Amendment and Revision, Page 118 The criteria should be identified that will be used by the Forest Supervisor to determine when amendments would result in a significant change in the Plan. There should be some consistency among forests in determining "significance of amendments." The policy and procedures for public participation in Plan amendments and revisions should be referenced in the Final Plan.

Table 5-1 - Monitoring Program Guidelines, Pages 119-125 The table should have a more complete legend to assist in interpreting the information. The program elements and activity codes should be explained.

Monitoring Program Guidelines, Table 5-1, Page 120 The concept implied here that annual analysis from water quality data will be evaluated to determine effects from management activities is a good one. We would like to review the monitoring plan. There may be specific suggestions we can make to maximize the usefulness of monitoring and provide effective use of limited funds. For example, monitoring of fishery habitat conditions may be more useful in terms of management direction than suspended solids. The "Bounds Beyond which Further Evaluation is Needed" is left blank. It should be water quality standards. The five year reporting and evaluation period for effects of management on flood plains and riparian zones should be reduced to 1-2 years to allow for problems to be corrected. For the resident trout "data source" (Page 124) how are temperature, channel stability, substrate type and fish population parameters connected (conceptually) to the activities that can cause them to change? Quality of the habitat may be a better "data source." This should be explained in the Final Plan.

Appendix 5 - Proposed Timber Sales, Pages 154-160 A map of the proposed sales would be helpful in understanding locations and potential impacts. The focus should be on identifying environmentally sensitive areas (riparian habitat, fishery habitat, water supply watersheds, unstable slopes etc.).

Capacity Range for Mt. Jefferson Wilderness, Corrective Action, Page 136 How are camping restrictions enforced? Are they self regulating? What is the compliance rate experience?

SUMMARY OF THE EPA RATING SYSTEM  
FOR DRAFT ENVIRONMENTAL IMPACT STATEMENTS  
DEFINITIONS AND FOLLOW-UP ACTION \*

Environmental Impact of the Action

LO--Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities with no more than minor changes to the proposal.

EC--Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantive changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EO--Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantive changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEO.

Adequacy of the Impact Statement

Category 1--Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information

The draft EIS does not contain sufficient information for EPA fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS which could reduce the environmental impacts of the action. The identified additional information, data analyses or discussion should be included in the final EIS.

Category 3--Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved this proposal could be a candidate for referral to the CEO.

\*From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment.



United States  
Department of  
Agriculture

Forest  
Service

Pacific Northwest  
Research Station

Forestry Sciences Laboratory  
3200 Jefferson Way  
Corvallis, OR 97331

Reply to: 1630

Date: April 16, 1986

Subject: Draft Forest Plan

To: Larry Mullen  
Deschutes National Forest

I have read the Deschutes draft Forest Plan and have a number of comments to make in my capacity as Research Natural Area Scientist for the Pacific Northwest Region. My comments pertain just to Research Natural Areas, and will address each bound volume I was sent.

#### Proposed Land and Resource Management Plan

P. 72 Under Recreation mention is made of activities that would be allowed as long as they do not impair research or educational values. The FSM 4063.3 (12/85 Amend 41) says to "Prohibit all forms of recreational use if such use threatens research or educational values." I realize this says somewhat the same thing as the plan, yet I see implicit in your statement more of an encouragement to recreate. This does not seem wise. Why not put exactly what the FSM states?

Under Recreation you allow oversnow vehicle use in the winter. I know of no precedent for this and feel recreational ORV use does not belong at any time in an RNA. It is very likely that winter research might occur on RNA's, and ORV use could clearly compromise this. Any encouragement of ORV use in RNA's, like the statement in the plan, should be eliminated.

P. 73 Under Integrated Pest Management any action involving suppression or prevention should be cleared by the Pacific Northwest Research Station Director.

#### Draft Environmental Impact Statement

P. 180 The footnote under Table 111-27 is not referenced to any particular RNA.

The acres for the RNA's in Table 111-27 are different from the acres mentioned on P. 546 in the Appendices.

I fully support the Preferred Alternative E as far as Research Natural Areas are concerned.

Larry Mullen, Deschutes National Forest

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#### Appendices

P. 543 The INTRODUCTION in Appendix F is well done. It is too bad that it does not occur in the DEIS. I think a statement in the DEIS about the importance and objectives of RNA's is needed.

P. 544 For what it is worth my last name has an 'E' on the end.

P. 546 Acres for RNA's are different from acres in Table 111-27 in DEIS.

P. 546-641 I am unsure why you bothered to print all the establishment reports. In some cases they are not even complete. Unfortunately since these reports were written a new FSM Supplement (4063.41) to the FSM, pertaining to establishment reports, came out in 12/85 (Amend 41). Additions and corrections will have to be made to all of the reports in Appendix F. I also feel that publication of the establishment reports (now called records in FSM!) could put us in a tricky position with the public if we find we need to make any changes, particularly as far as boundaries are concerned.

#### Maps

The ORV map prohibits ORV use in RNA's, as it should. This is not consistent with p. 72 in the Proposed Land and Resource Management Plan as I mentioned above.

If you have any questions pertaining to my comments or need any assistance regarding RNA's, please do not hesitate to ask. My number is (503) 757-4429 (FTS is 8-420-4429).

Thank you for the opportunity to comment.

*Sarah Greene*

SARAH E. GREENE  
Research Natural Area Scientist  
Pacific Northwest Region

cc:  
Bill Hopkins  
Glenn Cooper  
Stark Ackerman





Department of Energy  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208 - 3621

February 13, 1987

In reply refer to: EVR

Norman Arseneault  
Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, OR 97701

Dear Mr. Arseneault.

We were pleased to receive your letter of January 20, 1987, (1920/2720) which described potential powerline corridor "windows" through the Cascade Range and your commitment to maintain these important energy transmission corridor options. We completed a review as requested and discussed our comments with Hal Siegworth on January 28, 1987. This letter documents our comments.

McKenzie Highway "Window" - Oregon Highway 242 (Exhibit 1A,B,C)

We found the 132-foot right-of-way restrictions on the Willamette National Forest (constrained by South Boundary of Mt. Washington Wilderness, North Boundary of the Three Sisters Wilderness Area and McKenzie Highway) make the window unsuitable from an engineering standpoint as a high voltage corridor. However, we recommend that it be retained as a corridor window to accommodate the highway and potential low voltage lines, pipelines, etc.

Santiam Highway "Window" - US Highway 20 (Exhibit 2)

This corridor "window" is suitable from an engineering standpoint for high voltage transmission construction.

Willamette Pass "Window" - Oregon Highway 58 (Exhibit 3A,B)

This corridor "window" is suitable from an engineering standpoint for high voltage corridor construction. Hal Siegworth did inform us that the corridor as shown on the map exhibit would need to be narrowed to 1 mile in the vicinity of the Willamette Pass ski area. The remaining 1 mile of corridor should allow sufficient flexibility to locate a high voltage corridor. We would, however, like to review the revised window to confirm this.

Windigo Pass "Window" - Oregon Cascades Recreation Area (OCRA)

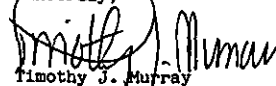
The Windigo Pass Window is wide enough for high voltage transmission construction, but would be very expensive and may incur a high level of impact due to

the extremely circuitous route. It would be more economical and perhaps involve fewer environmental impacts to straighten the window by crossing portions of the Oregon Cascade Recreation Area. We understand that the Forest does not wish to consider an expansion onto the OCRA at this time without project justification. Although there may be project benefits (schedule, economics) of obtaining Secretary approval of a revised window at this time, more studies would need to be done to determine the extent of the change necessary and the cost/benefits to be realized. We would like to assist in such a study but it obviously could not be done in time to be included in the Final Forest Plan and EIS. We recommend that such a study be completed prior to the next revision of your Forest Plan.

Your letter indicated that you had coordinated the corridor windows to a modest degree with the Willamette and Umpqua Forests. Since they manage some of the lands affected by the proposed corridor windows, the windows should also be presented in their Forest Plans. We would hope that as lead Forest your staff will insure such coordination.

We would like to take this opportunity to extend our appreciation for the Forest's excellent response to the long-range corridor planning and renewable energy resource issues. Your forest is one of few that has addressed these issues in the manner we feel they deserve. The consideration of potential geothermal development and associated transmission corridors is timely, and we appreciate the opportunity to assist. In particular we would like to thank Hal Siegworth. If you have any questions on our comments or need any additional assistance, please contact John Hooson (FTS 429-3299).

Sincerely,

  
Timothy J. Murray

Chief, Environmental Resources Branch

cc:

Forest Supervisor, Willamette National Forest  
Forest Supervisor, Umpqua National Forest  
John Cheek, Pacific Power and Light Co.  
Eric Stone, Oregon State Office, BLM



U S ENVIRONMENTAL PROTECTION AGENCY  
REGION 10  
1200 SIXTH AVENUE  
SEATTLE WASHINGTON 98101

REPLY TO  
ATTN:OF

WD-136

Norman Arseneault  
Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Mr. Arseneault

In accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act, we have reviewed the Supplemental Draft Environmental Impact Statement (SDEIS) for the Land and Resource Management Plan for the Deschutes National Forest. This SDEIS evaluates a new alternative, Alternative NC (No Change), which was developed from a Timber Management Plan approved in 1974.

Alternative NC does not incorporate all the provisions of the National Forest Management Act of 1976 and would not include the specific standards and guidelines for water quality protection. As such, we could not support the implementation of this alternative.

We understand that the purpose of this SDEIS was not to address public comments on the DEIS. Since our May 9, 1986 comments on the DEIS remain outstanding the rating on the DEIS and SDEIS are the same: EC-2 (Environmental Concerns - Insufficient Information).

Thank you for the opportunity to review this SDEIS. Please contact Wayne Elson at (206) 442-1463 for any questions concerning our comments.

Sincerely,

Ronald A. Lee, Chief  
Environmental Evaluation Branch

cc: USFS, R-6



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Centers for Disease Control  
Atlanta GA 30333

January 6, 1989

Mr. Norm Arseneault  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Mr. Arseneault:

We have reviewed the Supplement to the Draft Environmental Impact Statement (SEIS) for the "Deschutes National Forest". We are responding on behalf of the U S Public Health Service. We noted in our review that this SEIS is limited to assessing one additional alternative, a No Change alternative. Since this alternative poses no additional potential impacts upon the health and safety of forest workers or the general public, we have no additional comments to offer on this document beyond those we offered in our review of the Draft Environmental Impact Statement.

Thank you for sending this SEIS for our review. Please insure that we are on your mailing list for the the Final Environmental Impact Statement for this project as well as other documents which are developed under the National Environmental Policy Act (NEPA).

Sincerely yours,

David E. Clapp, Ph.D., P.E.  
Environmental Health Scientist  
Special Programs Group Center for  
Environmental Health and Injury Control





**Department of Energy**  
Bonneville Power Administration  
PO Box 3621  
Portland, Oregon 97208-3621

In reply refer to AJ

Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, OR 97701

Dear Sir/Madam:

Subject Comments on Supplement to DEIS, Deschutes National Forest Land and Management Plan

In October 1986 Bonneville Power Administration (BPA) met with representatives of the Deschutes and Willamette National Forests to discuss concerns occurring in the areas of Lake Odell, Suttle and Blue Lakes. As a result, of this meeting, it was agreed that a broad corridor window would be defined which would encompass several possible routes that had been evaluated. Both the Deschutes and Willamette National Forests were very cooperative, and as a result, we were left with the understanding that important corridor windows through the Cascades would be addressed in the final plan of each forest. We recognize however that the corridor windows are severely constrained by sensitive avoidance areas. This agreement was recently reconfirmed in a January 4, 1989, phone conversation with the Deschutes National Forest Lands Officer.

The Supplement to DEIS, Deschutes National Forest Land and Management Plan does not officially designate or describe existing or planned facilities or corridors. BPA would like to reconfirm our agreement by explicitly providing for these important corridors or corridor windows in the final Forest Plan and EIS.

If the Deschutes National Forest should foresee any problems in retaining these corridors or in determining how they would be addressed, please contact John Hooson with BPA's, Facilities Planning Branch (FTS 429-3299 or (503) 230-3299).

Sincerely,

Anthony R. Morrell  
Assistant to the Administrator  
for Environment



## United States Department of the Interior

OFFICE OF ENVIRONMENTAL PROJECT REVIEW  
300 N E MULTNOMAH STREET SUITE 1692  
PORTLAND OREGON 97232



December 20, 1988

ER 88/844

Mr. James F. Torrence, Regional Forester  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Mr. Torrence:

The Department of the Interior has completed its review of the Supplement to the Draft Environmental Impact Statement and Proposed Land and Resource Management Plan for the Deschutes National Forest, Deschutes, Jefferson, Klamath, and Lake Counties, Oregon. We have no comments to add to those already provided to you May 21, 1986.

Thank you for the opportunity to comment.

Sincerely,

For Charles S. Polityka





*Forestry Department*

**OFFICE OF STATE FORESTER**

2800 STATE STREET, SALEM OREGON 97310 PHONE 378-2560

MEMORANDUM

SUBJECT. AMENDED DEPARTMENT OF FORESTRY RESPONSE TO THE DESCHUTES NATIONAL FOREST DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PROPOSED LAND AND RESOURCE MANAGEMENT PLAN

TO: Norm Johnson, Federal Plans Coordinator

FROM: James E. Brown, State Forester

DATE: August 3, 1987

Attached for use by the Governor's office are additional comments by the Department of Forestry regarding the Deschutes National Forest Draft Environmental Impact Statement and Proposed Land and Resource Management Plan. These comments cover nine areas.

- o Minimum Management Requirements
- o Ponderosa Pine Inventory
- o Harvest Cutting Methods
- o Timber Management
- o Old Growth
- o Snag Management
- o Firewood
- o Fire Protection
- o Monitoring

Because of the significant implications of a severe reduction in the inventory of standing ponderosa pine on the forest, the alternatives originally presented in the DEIS may now be unrealistic and fail to address the public's issues and concerns. Until this topic is presented for full public review and comment, it would be premature to select an alternative that best meets the policies of the Oregon State Board of Forestry and the *Forestry Program for Oregon*. Therefore, the Department at this time withdraws its endorsement of a modified Alternative E-departure.

All other comments in the Department's April 9, 1986 response to the Deschutes National Forest DEIS remain intact.

The Department of Forestry looks forward to working with the Governor's office, other state agencies, the Forest Service, and the public in developing a successful plan for the Deschutes National Forest.

JEB/DM:jp

Attachments

cc. Fred Graf, Eastern Oregon Area Director  
Mike Howard, Central Oregon District Forester

THE DEPARTMENT OF FORESTRY'S ADDITIONAL COMMENTS ON THE  
DESCHUTES NATIONAL FOREST DRAFT ENVIRONMENTAL IMPACT STATEMENT  
AND PROPOSED LAND AND RESOURCE MANAGEMENT PLAN

Minimum Management Requirements - (App , page 273) The Board of Forestry has recognized in the Forestry Program for Oregon that forests are important for providing a full range of uses and benefits including wood production, water quantity and quality, recreation, wildlife, fisheries, and forage. As a result, the Board has adopted a policy to encourage and promote forest management practices which will maintain and enhance the full range of social and environmental benefits of the forest.

Based on this Board policy, the Department of Forestry supports the maintenance of viable populations of indigenous forest plants and animals. It is therefore appropriate that the U S Forest Service provides a minimum level of protection for forest resources in its national forest plans and presents the public with a range of alternatives which meet or exceed this minimum level.

However, the Department believes that two basic improvements in the application of minimum management requirements (MMRs) proposed for implementation by the Deschutes National Forest or the proposed revisions suggested by the Regional Office are needed. First, there is a need for further documentation and analysis by the Forest Service. Second, increased public involvement in the MMR decision making process must be permitted.

Please consider the following specific concerns and recommendations.

Need for Further Documentation and Analysis

1 Data Uncertainty - The credibility of the plan could be increased significantly if the MMR s were submitted to peer review. That review would help assure that the most current data and a broad base of professional expertise are reflected in the plan.

2 Alternative MMR Strategies - Only one set of MMR strategies is proposed in the plan and the sensitivity analysis to be provided in the Supplemental EIS will only vary the intensity of that one set. Where alternative methods for achieving the same objectives are available, displaying them would be beneficial and possibly avoid later conflicts with NFMA and NEPA public disclosure requirements.

3. Inconsistency Among National Forests - Based on the information provided in the forest plans published in Region Six to date, it appears that similar national forests may be modeling their MMRs differently, thereby providing inconsistent levels of protection and inconsistently applied constraints on other resources. No published documentation supports these differences or explains how each forest s MMR package provides for the minimum level of protection, as required or suggested by NFMA. If alternatives are displayed, as recommended in number 2 above, this concern would be overcome.

The need for and design of each MMR should be clearly explained in the forest plan. A display similar to the August 22, 1984 Wildlife MMR matrix produced by the Region should be included in the Final EIS. This now outdated matrix provided important data on the number of habitats being designated by each national forest for each indicator species, the acres of suitable land involved, and a measure of the effect of these allocations on timber management. Similar displays could be constructed for soil, water quality, and riparian MMRs.

Increased Public Involvement in MMR Decisions

4 Public Review - The decision making process consists of two elements:

a The identification of the level of protection or management that will be the 'minimum level' target suggested by NFMA.

b The methods chosen to effect this level of protection and management.

In the Deschutes planning process to date, these decisions and assumptions used in developing the MMRs were finalized and incorporated into all alternatives without the provision of any opportunity for full public review, as required by NEPA and NFMA. This action by the Forest Service makes the planning process vulnerable to legal challenges and prevents the agency from gaining the valuable input that the public and other resource professionals could have provided the Forest Service.

The process for implementing MMRs must be opened up fully to public review. By doing so, the Forest Service may be able to develop new alternatives that are more responsive to public concerns.

5. Legal Sufficiency - Minimum management requirements were developed by the Forest Service based on the Region's interpretation of the NFMA requirements. Other parties, including other Forest Service Regions, have interpreted these requirements differently. Unless the Forest Service improves the analysis of MMRs by adequately considering the concerns of environmentalists, forest industry representatives, and other parties, litigation of the MMR issue seems likely.

Ponderosa Pine Inventory - (DEIS, page 145) The Deschutes National Forest Final EIS should discuss the changing status of the ponderosa pine inventory. The amount of ponderosa pine available for future harvest was a central issue in the original ICOs as well as in the public comments to the DEIS. It now appears that the newly completed inventory will indicate a 39 percent reduction in the standing inventory of this species. At the same time, the forest is planning to accelerate the harvest of mixed pine stands threatened by the mountain pine beetle.

What will be the effects of this dramatic reduction in ponderosa pine availability on the economy and environment influenced by the Deschutes National Forest? What effect will the forest's new timber yield generators have on this projected decline?

Nearly two years have passed since the field data collection for the new inventory was completed, yet the Deschutes has not analyzed or modeled this new information. This work should now be given a high priority by the Deschutes and the resulting implications discussed in the Final EIS. Also, the potential of such practices as pruning should be explored to

find opportunities to ameliorate the projected shortfall in clear ponderosa pine logs. The economy influenced by the Deschutes depends on this high quality material for a large share of its income and value-added. This is particularly true in Crook County, due to the secondary processing segment of their forest products sector.

Future inventories should be designed to more specifically and accurately estimate the standing volume and growth of ponderosa pine on the forest in addition to the ponderosa pine working group.

Harvest Cutting Methods - (App, page 669) The Department of Forestry supports the flexible, site specific approach to the selection of harvest cutting methods required by the Regional Guide. The Deschutes is encouraged to maintain this flexibility in the forest plan. When determining the harvest cutting method, economic benefits to the forest and the timber purchaser should be considered as well as logging feasibility, stand characteristics, silvicultural response, and the effects on other resources and their uses.

Both even-aged and uneven-aged silvicultural systems should be analyzed for their ability to maintain the high value-added processing industry sectors in the long term. In addition, uneven-aged management should be considered to maintain timber yields in those areas where clearcutting is limited or prohibited to accommodate other resource uses. The Deschutes should work to improve the knowledge of uneven-aged management application in eastern Oregon forests through silvicultural research, refined yield tables, and economic analysis.

Timber Management - Additional information should be provided by the Deschutes to allow the public to see the long term effects of the proposed alternatives on the timber resource. Data on the relationship between timber inventory, harvests and growth, as well as the changes over the planning horizon in the number of working group acres by age class for each alternative should be provided in the Final EIS. These reports are readily available from the FORPLAN model (Reports 10.6 and 10.8) and should be constructed to provide this information for suitable, tentatively suitable, and total forested lands.

Old Growth - The Deschutes National Forest should expand its discussion on old growth timber in the Final EIS. Items that need to be included are

- 1 The definition of old growth stands used in the plan
- 2 The number of acres of old growth currently present on suitable and unsuitable forest lands
- 3 The number of acres of old growth retained on suitable and unsuitable lands in each of the alternatives and how ingrowth, mortality, and harvesting will affect this potential acreage over the next 100 years
- 4 The number of acres of old growth, regardless of timber suitability, needed to meet minimum management requirements

Snag Management - (App, page 254) On the Deschutes, the minimum management requirement for cavity nesters is the most constraining of all the wildlife MMRs on allowable sale quantity and present net value. In addition, all the DEIS alternatives except 'C' provide 3 to 4 times the MMR level of protection. However, the DEIS devotes very little text to this topic to explain how this requirement was developed and formulated in FORPLAN.

In 'Wildlife Habitats in Managed Forests', Thomas discusses ways of providing snag habitat while minimizing the effects on timber management. Please consider these points:

- 1 The use of uneven-aged timber management in certain stands may allow needed levels of snag production to occur with less cost to timber harvests. The loss of individual snags to blowdown and fire may be reduced if this system is used.
- 2 Snags do not have to be evenly distributed. Some clumping of snags into small patches may actually enhance nesting habitat for some species.
- 3 Selecting individual trees or small clumps of trees for snag retention or snag creation may be preferable to imposing a long rotation over a larger area.

4 The selection criteria for replacement snags should include the economic value of the tree. Limby, deformed, and broken topped trees should be selected over sound, straight, clear boled trees if wildlife habitat is the sole purpose for retention.

5 Areas not suitable for timber management should be managed to provide 100 percent of their snag habitat potential.

6 The time frame for the snag management goals should be considered. Requiring immediate compliance with a higher snag level can result in high first decade costs, especially where stands have been heavily salvaged in previous years.

As Thomas describes, setting the time frame for achieving this goal at 20 years would reduce the constraint on timber management and permit greater use of natural mortality for snags. The need for intentionally killing live trees during that period would be reduced. The long term retention of the higher level of snag habitat would still be assured.

Also note that the 1987 Oregon Legislature has passed HB 2152 which removes the requirement in Oregon law that snags be felled within 250 feet of the exterior boundaries of harvested units planned for burning. This change in the law should allow the Forest Service greater flexibility in retaining wildlife snags in harvest units.

Firewood - The Department of Forestry supports the provision of firewood for personal use from the Deschutes National Forest. However, we request that this volume be excluded from the allowable sale quantity calculations to maintain consistent treatment of this volume among national forests.

Fire Protection - (LRMP, page 43) The Department of Forestry supports the Deschutes' policy of applying aggressive suppression action to wildfires that threaten life, private property, public safety, improvements, or investments. However, the final EIS and LRMP should more clearly explain what criteria will determine when a "threat" exists and the appropriate response that will follow. Unplanned ignitions should be used as prescribed fires only if compliance with the Oregon Smoke Management Plan can be assured. Coordination of protection planning and suppression efforts with other protection agencies, including this Department, should be included as a part of these guidelines.

Monitoring - (LMP, page 118) The Siuslaw National Forest Proposed Land Management and Resource Plan provided an excellent basis for monitoring their implemented forest plan. The Deschutes should consider a similar program. Also please refer to the Department of Forestry's November 6, 1986 correspondence to the Regional planning staff (attached) for additional comments on this important issue.

DM



## Department of Geology and Mineral Industries

### ADMINISTRATIVE OFFICE

910 STATE OFFICE BLDG, 1400 SW 5th AVE PORTLAND OR 97201-5528 PHONE (503) 229-5580

July 22, 1987

Norman Johnson  
Forest Planning Coordinator  
Executive Department  
155 Cottage Street N.E.  
Salem, OR 97310

Dear Mr. Johnson:

In response to the public comment received on the Wallowa-Whitman, Ochoco, and Deschutes Forests, we are satisfied with our comments already presented. The public comment regarding geothermal activity in the Deschutes Forest was previously addressed in our initial comments, and we stand by our comments as presented. Geothermal resources are a generally rare and valuable commodity which can be developed compatibly with other forest resources.

We feel that inventory data must be presented before accurate judgements can be made regarding geothermal and other mineral resources. It is difficult for the public to comment on the plans in absence of inventory data. Similarly, it is difficult for the public to recommend a preferred alternative in plans which lack minerals data.

In general, although public comment did not focus on mineral resources, these remain of potentially significant value and should be factored into the planning process for each forest. We appreciate being part of the Forest Plan review process, and will continue to provide input.

Sincerely,

John D. Beaulieu  
Deputy State Geologist

DEW:rm





Forestry Department

OFFICE OF STATE FORESTER

2600 STATE STREET SALEM, OREGON 97310 PHONE 378-2560

GENERAL FILE  
7-2-3-200

November 6, 1986

Mr. Bob Lewis  
US Forest Service  
P.O. Box 3623  
Portland, OR 97208

SUBJECT: MONITORING AND EVALUATION OF NATIONAL FOREST PLANS

Dear Bob.

I apologize for the delay in sending you the Department of Forestry's comments on the draft monitoring and evaluation program. A severe fire season in August and our Forestry Program for Oregon townhall meetings in September consumed most of our time. The Department believes that this element of the EIS is extremely important in measuring the overall success of the planning effort. Our discussions with the planning staffs of most Oregon national forests echoes this same conclusion.

A review of Forest Service direction, both internal and through federal regulations regarding the monitoring and evaluation program, offers guidelines and requirements for national forests to follow. For example, specific items that must be monitored are noted in NFMA (36 CFR 219.12(K)(5)); other items which could be measured are outlined throughout NFMA regulations. The Department believes that the monitoring program presented in the individual plans should address the following elements:

1. Identification of essential resources to monitor;
2. Appropriate frequency of measuring these resources,
3. Expected reliability and cost of the monitoring programs, and
4. Variability standards for initiating an evaluation.

The Department is concerned not only with the completeness of the items listed above but also with the notification process for informing public agencies or other interested parties about amendments and/or revisions to the EIS that are made as a result of the monitoring process.

Varying levels of measurement can be used to monitor and evaluate national forest plans. These include:

1. The action or activity has occurred and the event has been accomplished

Bob Lewis  
November 6, 1986  
Page 2

2. The performance is proper and the objectives have been reached.

3. The goal of the plan has been reached.

The degree of involvement in the monitoring process could vary within the organization. Ranger districts, for example, will monitor project accomplishments. National forests will track the actions and accomplishments of the entire forest. Region 6 would review the final outputs to see if regional goals have been reached. Our comments will be directed toward monitoring accomplishments at the national forest level.

Resources to Monitor

In addition to those items identified in 36 CFR 219.12(K)(5), we believe the following resources should be included in the monitoring and evaluation plan:

1. Timber Volume

- a. Planned actual allowable sales quantity.
- b. Actual annual timber volume sold.
- c. Actual annual timber volume cut.
- d. Species composition.

2. Intensive Management

- a. TSI and Release.
- b. Fertilization.
- c. Continued research.

3. Land Withdrawals

- a. Unroaded areas.
- b. Reduction in suitable lands.

4. MMR Requirements

- a. Are minimum management requirements for protecting special resources greater or less than those minimums now occurring?
- b. Can new research alter protection standards necessary to protect resources to the minimum level?

5. Economics

- a. Values of forest goods and services.
- b. Return to counties.
- c. Levels of employment.
- d. Personal income levels.

#### 6. Other Resources

- a. Air quality.
- b. Water quality.

The Department of Forestry will be closely monitoring elements identified in items 5 and 6 which are the result of items 1-3.

Both amenity and commodity resources should be monitored to determine if the plan is meeting its intended objectives.

#### Frequency of Monitoring and Reporting

The frequency of checking a plan or identifying how often the resource will be monitored is a fairly basic question which must be addressed in the monitoring plan. Depending upon the resource to be evaluated we believe that most items should be reviewed on a yearly basis, with some others on a five year interval.

Amendments to the plan should be considered if the objectives of the resource to be evaluated exceed the variability standard noted in the monitoring plan.

Reporting of the actual results from monitoring should also be identified. The Siuslaw National Forest draft monitoring plan presents a good example for the identification of time frames for reporting resource management accomplishments.

#### Reliability and Cost

The monitoring and evaluation plan should include measurements of expected precision and reliability to be obtained from monitoring a particular resource. Reliability of data is dependent upon sample size and funding available to conduct the evaluation. Some resources, due to their nature, will require more expenditures in order to obtain the needed results. Current budget cutbacks must not be overlooked when developing the monitoring plan.

#### Variability Standards

Variability standards are the most important element of the monitoring plan. The question is: "How much variability from the standard will be acceptable to the Department and the State of Oregon, that initiates an evaluation of the existing plan?" Variations of 25 percent on harvest levels, for example, will have an unacceptably severe effect on the social and economic environment of local communities and the state as a whole.

Variability standards should take into account uncertainty in data and knowledge regarding special resources. It is unacceptable that both local and state economies suffer as a result of decisions based on unrefined data. The situation is critical in that a high variability standard could allow for many changes due to data refinement before a major plan revision was triggered.

The cumulative effect of these changes could be devastating to a local community. On the other hand, low variability standards might lead to continual plan revisions as better information becomes available regarding the management of a specific resource. A well designed monitoring program would protect all resources from unforeseen risks and could incorporate new, more reliable data into the plan as it becomes available.

#### Notification Process

NEPA mandates that the public, including the Department, must have the opportunity to be involved in the monitoring and evaluation of the plan. Since coordination and cooperation should be one of the review items in the monitoring plan, a notification process is essential.

It seems logical that since draft and final EIS's will be sent through the State Clearinghouse, so also should proposed plan amendments. It is suggested that the Clearinghouse continue to be used to notify interested parties of plan amendments and/or revisions.

Amendments should be reviewed continually so that the Department can monitor the cumulative changes that take place. If the Clearinghouse is not used by the forests for amendments, then the Department should be assured by some means that we will receive a copy of all plan amendments. Frequency of review for the items and management practices included in the monitoring plan should be on an annual basis unless a major plan revision is initiated.

#### SUMMARY

The monitoring and evaluation stage of national forest planning allows the Department the opportunity to observe and analyze the effects of implementation of individual forest management plans. Implementation of the plans affects not only community stability but the health of the entire state's economy.

Our review of the Siuslaw National Forest draft monitoring plan and the Region working paper on monitoring present similar ideas for all national forests to follow. We believe that the direction outlined in the Region's working paper presents a reasonable approach for forests to implement when developing their monitoring program.

In summary we encourage each forest to develop comprehensive monitoring and evaluation programs which accomplish the following:

1. Identify important resources which, when evaluated, display whether the plan is meeting its original goals and objectives. The economic influence on local and the statewide economies should be a major element indicating the success or failure of the plan. As such it should be frequently monitored in all plans.



Bob Lewis  
November 6, 1986  
Page 5

2. Frequency of monitoring will allow the planning staff an opportunity to adequately track the effects of a plan. It is essential that resource monitoring be timely and appropriately evaluated before serious problems arise which cannot be corrected.
3. Each forest's monitoring plan must include a reasonable process for triggering a plan amendment or revision. Variability standards or probability standards are the key to determining when a particular resource should be reevaluated. The Siuslaw National Forest has developed a reasonable program for including these standards in their monitoring questions.
4. A notification process for plan amendments or revisions to inform and involve interested parties must be developed to insure that a uniform system is in place and workable.

We agree with you that in order to retain a reasonable program it is important to keep it simple. Our comments are intended to assist you in finalizing the Region's direction on monitoring.

Sincerely,

*James E. Brown*  
James E. Brown  
State Forester

JEB/BB:cn  
6344E



STATE OF OREGON

INTEROFFICE MEMO

TO : Norm Johnson  
Forest Planning Coordinator

FROM : Ann Hanus  
State Economist

SUBJECT : Deschutes National Forest Plan

DATE August 13, 1987

The Deschutes National Forest released preliminary inventory figures showing about the same cubic feet available as assumed under their plan but a major downward revision in the amount of ponderosa pine available. According to the new data, the ponderosa pine inventory could be 39 percent lower than thought. Since ponderosa pine is the most valuable species in terms of the number of jobs generated per million board feet, a large harvest decrease would adversely affect the local economy.

I assumed that more ponderosa pine would be available as did the Forest Service in their economic analysis. This assumption was a major one since a lower harvest would mean fewer jobs and less county revenues. Many of the local mills are primarily or completely dependent upon ponderosa pine. According to the Employment Division, a major reduction in this resource will lead to either mill closures or substantial and expensive modification to some existing mills in order to process the other available species.

Since a reduced ponderosa pine harvest would have a profound effect on the local economy, I urge that the Forest Service expedite its inventory study. Currently, the Forest Service estimates that it could take another two years to complete the inventory study. After the inventory study is completed, it should do another economic analysis based on the new data. This analysis should be done prior to selecting an alternative and issuing its Final Environmental Impact Statement and Record of Decision. Furthermore, the state should be able to comment on the plan again once the new economic analysis is completed.

More research should be devoted to examining the feasibility of pruning. The purposes of pruning ponderosa pine would be to create more high quality, clear wood. As the supply of old growth ponderosa pine becomes more scarce, it may be prudent to explore ways to ensure a stable supply of high quality, millable ponderosa pine. Mills prize ponderosa pine since it can be easily fashioned into many products. As a result, ponderosa pine yields the most jobs per million board feet of any other species in Eastern Oregon.

The Forest Service should be encouraged to apply uneven aged management where it is economically and biologically feasible especially in areas that are important for recreational purposes. Uneven aged management may result in more old growth ponderosa pine available over time. Further, it may visually preserve areas that are valued for recreation.

ANH:sb  
cc: Fred Miller  
Jon Yunker  
6301j



STATE OF OREGON

INTEROFFICE MEMO

TO Norm Johnson, State Coordinator  
for Forest Plans

DATE August 13, 1987

FROM John Beaulieu, Deputy State Geologist  
David Kish, Acting Director, Department of Energy  
William H. Young, Director, Water Resources Department

SUBJECT State Agency Position for Geothermal Energy on the Deschutes  
National Forest

In response to your June 23, 1987, memo requesting agency comments on the Deschutes, Ochoco and Wallowa-Whitman forest planning documents, we offer the following recommendation with respect to geothermal development in the Deschutes National Forest.

The Energy Facility Siting Council and Deschutes County have each designated an area around Newberry Crater in which geothermal development is prohibited. We suggest that the Forest Service adopt this EFSC/Deschutes County boundary in whichever forest plan is selected. Additionally, we believe the intent of the no-surface occupancy restriction for this area would not be compromised if the Forest Service allows for sub-surface leasing. This policy would allow for directional drilling under the restricted area from outside the restricted zone. Future geothermal development, however, would not be allowed within the EFSC/Deschutes County boundary area where surface restrictions apply.

It should be noted in the forest plan that any development of low-temperature geothermal resources (fluids less than 250 degrees Fahrenheit) must conform to Oregon Water Law and pertinent administrative rules of the Water Resources Department. These rules were attached to the previous comments.

Finally, we would encourage the Forest Service to inform any potential geothermal developer wanting a lease to contact the appropriate state and local agencies for additional assistance and the necessary resource permits.

0660j



Department of Environmental Quality

811 SW SIXTH AVENUE PORTLAND OREGON 97204 PHONE (503) 229 5696

August 17, 1987

Norm Johnson  
Federal Plans Coordinator  
Executive Building  
155 Cottage Street NE  
Lower #2  
Salem, Oregon 97310

Dear Norm,

Our review of public response to the Draft National Forest Plans has brought out an issue on which we have not previously commented. The strong public support for continued (or expanded) woodcutting programs is in conflict with serious air quality problems caused by woodsmoke in several major urban areas of the state. Within the coming nine months, the Department will be working with the communities of Klamath Falls, Medford, Grants Pass, and Eugene/Springfield to develop programs to mitigate serious woodsmoke problems.

It is our understanding that wood cutting permit fees do not fully reflect the market value of the fiber or the cost to the Forest Service to provide the firewood to the public. This subsidy of firewood makes firewood appear to be a more economical energy source than it really is. If one considers the public health costs associated with woodsmoke in urban areas of Oregon, it clearly is not appropriate to encourage the residential use of firewood through subsidy.

Consideration should be given to increasing woodcutting permit fees to reflect the true cost and value of the firewood. A significant portion of these fees could be provided to local governments that are developing programs to mitigate the woodsmoke problem.

From an energy, economic and environmental perspective, the highest and best use of firewood is industrial or power generation under well-controlled combustion and emission conditions. We believe this use of wood fiber residues to be consistent with Forest Service policy to utilize National Forest resources for the highest and most beneficial purpose.

In view of these issues, we recommend that the Forest Service reconsider its woodcutting program policy during the preparation of the Final Forest Plans.

Sincerely,

*Fred Hansen*  
Fred Hansen  
Director

FH:d  
AD1227

Appendix J-54



STATE OF OREGON

INTEROFFICE MEMO

TO Norm Johnson, Federal Plans Coordinator      DATE August 14, 1987

FROM Richard G. Reiten, Director  
Economic Development Department

SUBJECT Deschutes National Forest Plan Revisited

Upon reviewing the Department's previous response to the Deschutes plan, I come up with the following issues

1. The Mt. Bachelor ski area is covered by its own master plan which is left unchanged by the forest plan. The Central Oregon Intergovernmental Council is satisfied with the cooperation of the Forest Service in working with Mt. Bachelor, Inc. (the lessee for the ski resort)
2. The original preferred alternative called for a large harvest of lodgepole pine relative to ponderosa pine and prescribed even-age management (or clear-cutting) as the primary timber management technique. The public response to the draft plan overwhelmingly was opposed to clear-cutting as a timber management technique. The forest staff is now considering the possibility of adopting an uneven-aged management technique

Additionally, the purpose of accelerating the harvest of lodgepole pine was to control the bark beetle. However, the beetles went through the lodgepole at a much faster rate than expected and are now threatening ponderosa pine. This may require a change in strategy in fighting the beetles calling for an increased harvest of ponderosa pine.

What impact will the above mentioned changes have on the species mix and the allowable cuts proposed in the draft plan? The Deschutes Forest will be publishing two new alternatives. 1) A no action alternative and 2) an alternative that shows the impact of phasing in uneven-aged management over the life of the plan. Hopefully, these two alternatives will shed some light on these issues.

3. Since our first response there is new information concerning a waferboard plant in Bend. The proposed plant was cancelled due to the devaluation of the U.S. dollar relative to the Deutsche Mark. The equipment was to be purchased from a German company.

Just recently the Deschutes, Fremont and Winema National Forests have jointly requested proposals for the utilization of dead and green timber that is suitable for waferboard. Previously, the forests were guaranteeing a five year supply of this material. Now they are guaranteeing a ten year supply. A number of forest products companies, including Weyerhaeuser and Georgia-Pacific, are studying the feasibility of utilizing these materials.

Norm Johnson  
August 14, 1987  
Page 2

4. The Central Oregon region is in the process of developing a regional development strategy along the guidelines prescribed by the Economic Development Department's Regional Strategies Program. The indications at this point are that Central Oregon Region's strategy call for tourism development.

The Central Oregon Intergovernmental Council has stated that the Deschutes forest plan's preferred alternative satisfactorily protects the region's tourist-related resources. They are aware of the importance of wood products to their economy and are seeking to balance the need for timber with the protection of visual resources for tourism. They are watching closely for what the Forest Service's final plan will recommend and they desire to be part of the decision process.

The Economic Development Department finds that the draft plan has adequately provided for tourism development. The plan emphasizes the potential for increased employment in tourism to offset job losses in timber-related jobs due to a decline in the allowable cut. The plan, however, does not address the issue of potential reduced incomes. Tourism related jobs pay, on the average, significantly less than timber-related jobs.

From the indications we have received from the Central Oregon region, the regional strategy will attempt to demonstrate a link between increased tourism and the location of industry, particularly high technology companies, to the area. If this link is shown to exist in the Central Oregon area, then it can be shown that a tourism strategy can lead to an increase in "family wage jobs."

RGR:jws

STATE OF OREGON  
EMPLOYMENT DIVISION  
DEPARTMENT OF HUMAN RESOURCES

TO: Ann Hanus, State Economist  
Address: Executive Department  
Date: July 21, 1987

FROM: D R Steward, Ass't Administrator  
Address: For Research and Statistics  
No RES:JRH-R&S2

Subject: Deschutes National Forest Plan

Attached are some additional comments on the Deschutes National Forest Plan submitted by Mike Mahan, our Central Oregon Labor Economist. In addition, I have enclosed a "Forest Plan Report" update issued last April by the Deschutes National Forest. This update discusses two significant issues.

The first issue deals with preliminary data from the most recent (1983-85) timber resource inventory. Although the new data show only 2.6% less total timber volume available than was originally projected and used in the Draft Forest Plan, the species mix has changed. The report states that "the amount of ponderosa pine available is less than the data on which the Forest Plan was based, and the amount of firs, hemlock and lodgepole pine is greater." The extent of the downward revision in ponderosa pine inventory (nearly 40%) is very important since some of the local mills are primarily or solely dependent upon this species. A major reduction in this resource will lead to either mill closures or will require substantial and expensive modification to some existing mills in order to process the other available species. Unfortunately, a complete analysis of the implications of the new inventory data, "will take two plus years" according to the report.

In addition to having a significantly lower volume of ponderosa pine available than earlier thought, the update report also indicates that the Deschutes National Forest planned to accelerate the harvest of ponderosa pine in the short-term while slowing the harvest of lodgepole pine. This shift in the timber harvest program was proposed because forest personnel discovered last summer that the Mountain Pine Beetle was moving into the more valuable ponderosa pine stands more quickly than earlier thought. Apparently, this accelerated timber harvest strategy elicited public opposition. The Deschutes National Forest now plans to stem the beetle attack by re-distributing the current level of ponderosa pine harvest among several districts so as to concentrate cutting on the district with the greatest potential for insect damage.

These two new developments since the Draft Plan was released need to be considered and incorporated into the Final Plan.

Attachments

cc: Staten  
Mahan

JRH pjg

0009/11

State of Oregon  
EMPLOYMENT DIVISION  
Department of Human Resources

TO: Michael D. Staten, Supervisor  
Address: Labor Market Information Programs  
Date: July 9, 1987

FROM: M C Mahan  
Address: Labor Economist  
No 0115A

Subject: Update of comment on the Deschutes National Forest Land and Resource Management Plan

Pending receipt of any actual Plan revisions original comments submitted in March of last year appear to adequately respond to issues identified at that time. It does appear that a revised timber resources inventory has been completed since the original Plan was submitted for comment. It is likely that some time will elapse before the Deschutes NF staff completes their analysis of the new inventory and applies findings to present yield tables, however.

When viewing timber resources in relation to their overall economic impact two additional general comments do seem in order. First, the changing nature of the timber harvest, with an increased emphasis on second growth and less desirable species, will dictate the direction of future investment towards structural panel and other chip or fiber based products. These plants will be highly capital intensive and their construction may well rest upon increased flexibility on the part of the Forest Service in allocating resources by means of long term and negotiated harvest contracts.

Second, there is a need for regional I/O analysis based upon all available timber resources, regardless of ownership, and their anticipated pattern of future harvesting, in order to provide accurate economic impact information.



J. R. GOLDSCHMIDT  
GOVERNOR

## Oregon Department of Agriculture

635 CAPITOL STREET NE SALEM OREGON 97310-0110

### Grazing Supplement to Oregon Department of Agriculture Comments on the Proposed Land and Resource Management Plan for the Deschutes National Forest

The purpose of the following comments is to address range and grazing issues for the proposed Land and Resource Management Plan for the Deschutes National Forest.

Grazing on national forest lands must be addressed from two standpoints economic and environmental. Economic issues will be first addressed in these remarks.

As is well known, grazing is a historic use on national forest lands, including the Deschutes. Early economies of local communities were primarily dependent on the timber and livestock industries. These two industries still play an extremely important role in the economic health of communities surrounding the Deschutes National Forest.

Livestock grazing is important on the Deschutes, due to the lack of summer forage available on surrounding private lands. Commercial cow-calf operations of the nature found in the area need year-around forage. This requires the use of federal grazing allotments for these ranches to function as successful economic units.

Current grazing on the Deschutes is somewhat limited due, basically, to two factors. The first is the general lack of water availability on most grazing allotments. Ranchers are often forced to transport water for livestock use in order to utilize their allotments. This practice is expensive, often prohibitively so. There would no doubt be more demand for grazing on the Deschutes National Forest if water were more readily available. Consideration should be given to the development of sources of livestock water in the final plan.

The other major factor limiting the demand for grazing on the Deschutes is tied to the recent economics of the overall beef industry. Due to depressed beef prices over the past several years, ranchers nationwide have reduced the size of their herds or liquidated entirely. Nationally, this has created a forage surplus. No doubt this has reduced the recent need for grazing on Deschutes National Forest lands. Beef prices are on the rise, however, and cattle numbers and grazing needs can be expected to grow in coming years.

Regarding environmental issues related to grazing on the Deschutes National Forest, the Forest Service is to be complimented for identifying and addressing those of significant concern. Of particular interest is proper grazing management in riparian areas (stream-side management units). The stated Forest Service goal to "protect the unique and valuable characteristics of riparian areas and to protect or improve water quality and fish habitat", is commendable. It is recommended as outlined in the Deschutes plan, that livestock management

-2-

strategies like rotation grazing and proper location and movement of salt and mineral blocks be used. Expensive measures like fencing should be implemented when these practices are unable to protect the integrity riparian areas. Similar strategies should also be encouraged to protect against over grazing on general rangelands.

In concluding these remarks, it must be stressed that livestock grazing should be managed at no less than the current level of 29 MAUM's, and that potential for growth to the proposed Forest Service range target of 32 MAUM's is essential to provide room for the livestock industry expansion likely to occur in the next decade.

Prepared by the Soil and Water Division, Oregon Department of Agriculture

bmR33- 1H  
8/5/87



Forestry Department  
**OFFICE OF STATE FORESTER**

2600 STATE STREET, SALEM, OREGON 97310 PHONE 378-2580

March 21, 1990

Norm Arseneault  
Deschutes National Forest  
1645 Highway 20E  
Bend, Oregon 97701

Dear Mr. Arseneault:

As you know, the Deschutes National Forest Draft Environmental Impact Statement assessed the compatibility of the selected alternatives with the plans of others, including the "Forestry Program for Oregon" developed by the Oregon Department of Forestry. On January 3, 1990 the Oregon Board of Forestry adopted a new "Forestry Program for Oregon" (FPFO).

The new FPFO is significantly different than the FPFO analysed in the DEIS. The FPFO (1982) assessed in the DEIS included timber outputs assigned to the various forest landowners, including federal, required to accomplish the coordinated programs contained in the FPFO. The volume figures previously given to the national forests, including the Deschutes National Forest, are no longer part of the FPFO.

The new FPFO focuses on intent, rather than on specific numbers, and reflects a broader interest in all forest uses, rather than focusing on timber production. The objectives of the new FPFO relevant to the Deschutes Forest Plan and FEIS are:

1. Preserve the forest land base of Oregon and assure practical forest practices that conserve and protect soil productivity, and air and water quality by:
  - a. Developing land use recommendations that recognize that forests are dynamic and most forest uses are compatible and that emphasize the integration of forest land uses;
  - b. Encouraging federal agencies to maintain as large and as stable a commercial forest land base as possible and to minimize future withdrawals from this land base;

Norm Arseneault  
March 21, 1990  
Page 2

c. Recommending that habitat should be managed based upon sound research data and the recognition that forests are dynamic and most forest uses are compatible over time; and

d. Cooperatively establishing forest management standards and regulations for the protection of necessary habitat that are based upon the best knowledge available and that are consistent with responsible forest management;

2. Promote the maximum level of sustainable timber growth and harvest on all forest lands available for timber production, consistent with applicable laws and regulations and taking into consideration landowner objectives by;

a. Promoting timber growth and harvest on public lands in a manner consistent with the governing statutory direction while seeking to meet Oregon's timber needs through the application of enlightened land and resource management.

b. Supporting the use of intensive timber management practices where those practices are professionally, environmentally, and economically sound.

c. Supporting federal policies and initiatives that provide sufficient funding for forest management and timber sale programs on federal lands.

3. Encourage appropriate opportunities for other forest uses, such as fish and wildlife habitat, grazing, recreation and scenic values on all forest lands, consistent with landowner objectives by;

a. Encouraging a full range of recreational opportunities on both public and private lands consistent with landowner objectives.

b. Promoting adequate funding for the full implementation, operation and maintenance of forest recreation facilities, including trails, campgrounds, etc., on public forest lands allocated for forest recreation.

4. Devise and use environmentally sound and economically efficient strategies to protect Oregon's forests from wildfire, insects, disease, and other damaging agents by;

Norm Arseneault  
March 21, 1990  
Page 3

a. Encouraging cost-effective federal fire management policies that emphasize planned ignition fires over natural ignition fires and that consider impacts to the State of Oregon's forest fire protection program;

b. Encouraging that federal plans which develop and implement fire suppression policies at both the state and national levels be coordinated with the state; and

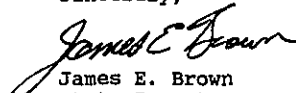
c. Promoting the effective use of integrated pest management as a coordinated approach to the selection, integration and implementation of pest control actions.

Information in the FEIS on the consistency of the selected alternatives with the plans and policies of state agencies is important public information. Since the new FPFO is different from the previous FPFO in both tone and scope, it is very likely that an assessment of the compatibility of the new FPFO with the selected alternatives would result in much different conclusions than those presented in the DEIS. Certainly the number of the issues reviewed for compatibility would be much greater.

As a public document, I believe it is important that the information included in the FEIS be as correct and up-to-date as possible. Therefore, if possible, the Deschutes National Forest FEIS should reflect the significant policy changes recently made to the "Forestry Program for Oregon" by the Oregon Board of Forestry.

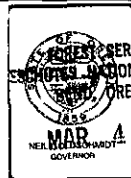
I appreciate the consideration you have given to the input provided by the Department of Forestry during the development of the Forest Plan and FEIS. Dave Stere (378-5387) of my staff is available to assist you with regard to the new "Forestry Program for Oregon".

Sincerely,

  
James E. Brown  
State Forester

JEB:tll  
V:\document\newfpfo

cc: Norm Johnson



Department of Geology and Mineral Industries

ADMINISTRATIVE OFFICE

910 STATE OFFICE BLDG, 1400 SW 5th AVE, PORTLAND, OR 97201-5528 PHONE (503) 229-5580

March 3, 1987

Mr. Larry Mullen  
Deschutes National Forest  
1645 Highway 20 E  
Bend, OR 97701

Dear Mr. Mullen:

This is in response to your December 1, 1986 summary of comments to the Deschutes National Forest DEIS. It will supplement our April 4, 1986 comments.

The summary of comments lists several comments that were made regarding energy and minerals. The comments concerned geothermal leasing and its compatibility with other forest uses. These uses included roadless areas, visual and critical wildlife habitat, and "other resources." A further comment was listed which objected to the overlap of winter recreation areas with geothermal management areas.

As we pointed out in our April 1986 comments, the leasing and development of geothermal resources should be given a high priority in non-wilderness areas of the forest. Roadless or particularly sensitive areas could be leased, but possibly with a provision of No Surface Occupancy.

Many of the reviewers may not realize that geothermal development can exist with other activities, such as winter recreation, without conflicting with those activities.

Because Deschutes National Forest may contain one or more rare, high-quality geothermal resources, the exploration of this resource should be considered at least on an equal value with other resources in the forest.

Sincerely,

Dennis L. Olmstead  
Petroleum Engineer  
DLO/sf  
Olmstead/B:Mull2-23





# Klamath County - Board of Commissioners

COURTHOUSE ANNEX — 305 MAIN ST — 503-882 2501 EXT 290 — KLAMATH FALLS, OREGON 97601-6391

MEMORANDUM TO Deschutes National Forest Planners  
FROM: Klamath County Board of Commissioners  
SUBJECT: Deschutes National Forest Plan  
DATE: May 7, 1986

In the Deschutes National Forest Plan, the issues of greatest concern to Klamath County include the Ponderosa Pine scheduled for harvest, annual revenues to counties, geothermal leasing, and a provision for harvesting firewood. You will find Klamath County's position relative to these issues expressed in the "Conclusion" section (pages 15 and 16) of the attached report. More specifically, we would suggest a proportionately larger share of Ponderosa Pine be scheduled for harvest (106 MM board feet annually), that a minimum of 60,000 cords of firewood (in addition to the allowable timber sale) be provided to the public on a non-competitive basis, and that revenues to counties continue at or above current levels.

Klamath County is not recommending a preferred alternative, but does prefer a combination of several alternatives with E seeming the most likely.


We appreciate the opportunity to participate in your planning process.

BOARD OF COUNTY COMMISSIONERS

  
Jim Rogers  
Chairman of the Board

Out of Office Today

Roger Hamilton  
County Commissioner

  
Carroll Zon Gerbert  
County Commissioner

## DESCHUTES FOREST PLAN REVIEW: STAFF ANALYSIS OF MANAGEMENT ALTERNATIVES

- Klamath County Planning Department -

Doug Montgomery, Associate Planner  
David Perry, Planner

March, 1986

/Trj

AN EQUAL OPPORTUNITY EMPLOYER



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DESCHUTES FOREST PLAN REVIEW:  
STAFF ANALYSIS OF MANAGEMENT ALTERNATIVES

Introduction

The Deschutes National Forest is located on the east slope of the Cascade Mountains in central Oregon. The forest lies mostly in Deschutes County, but extends into Jefferson County to the north, and into Klamath and Lake Counties to the south. Within the forest boundary, there are over 1.85 million acres, of which 1.6 million are National Forest lands. About 18 percent, or 287,000 acres of the Forest is located in northern Klamath County. Klamath County areas most affected by management plans of the Deschutes Forest include the wood products oriented communities of Gilchrist, Crescent, and Crescent Lake. County government is also affected by management direction in terms of Forest Service revenue allocations.

The purpose of the Forest Plan is to guide Forest Service activities and programs in the Deschutes National Forest from 1986 through 2001, unless a revision is needed earlier because of changing conditions. The Forest Plan guides all natural resource management standards and guidelines for the forest. It describes management practice, levels of resource production and management, and the availability and suitability of lands for resource management.

The Forest Service, in compliance with the National Environmental Policy Act of 1969 and the Forest and Rangeland Renewable Resources Planning Act of 1974 - as amended by the National Forest Management Act of 1976 - is presenting eight management alternatives for the Deschutes National Forest. The Forest Service Preferred Alternative, as presented in the draft Environmental Impact Statement document, is Alternative E. The Forest Service is accepting public input regarding the eight alternatives until May 9, 1986.

Analysis of Alternatives  
Key Issues and Alternatives

Key issues identified by Deschutes Forest planners include timber management, recreation, wildlife, energy, and revenues generated by each alternative management scenario.

Alternative A - This is the "No-Action" Alternative and does not specifically address the identified issues and concerns. Alternative A assumes continuation of current management direction, as required by NEPA, under the Deschutes Forest 1978 Land Management Plan. The 1978 Plan features a blend of land uses intended to balance resource uses. Undeveloped recreation, visual quality, and deer habitat management are emphasized along with timber and range management. Some emphasis is placed on developed recreation, old growth, and threatened and endangered species.

Alternative B - The goal of this Alternative is to meet the 1980 Resource Planning Act (RPA) program as identified for the Deschutes National Forest in the Regional Guide. Alternative B provides moderate levels of resource outputs. The Forest would be intensively used and developed, but options for maintaining undeveloped lands and old-growth ecosystems would be retained. A mix of developed and undeveloped recreation opportunities would be provided. This Alternative would provide for increases in deer and bald eagle population and some of the higher potential geothermal areas would be available for leasing. Scenic quality would be emphasized along heavily used roads, developed recreation areas, and some roads to trail heads.

Alternative C - The goal of this Alternative is to maximize present net value and provide increased use of commodity resources and other resources which have potential to increase contributions to the local economy.

Much of the Forest would be used for producing commercial timber. This Alternative would permit the maximum amount of geothermal leasing. Recreation management would focus on providing access and

facilities for large numbers of people, such as developed recreation sites, vehicle use in the summer, downhill skiing and snowmobiling in the winter, deer hunting, and fishing. The Forest would be heavily roaded. Scenic resources would be protected or enhanced along heavily traveled roads.

Alternative D - This alternative would provide dispersed recreation opportunities combined with timber production and protection of visual resources. Recreation management would focus on providing vehicle access for single-day, short-term use. To complement the recreation emphasis of this Alternative, scenery along travel routes and areas viewed by large concentrations of people would be maintained or enhanced. A large part of the Forest would be intensively managed for timber production but would be screened from view from major roads and trails. Much of the area with geothermal potential could be leased. High levels of habitat for osprey, eagles, and deer would be provided.

Alternative E - Preferred - This Alternative is similar to Alternatives B and F but different prescriptions have been applied to specific areas of the Forest. You will need to consult the maps to fully understand the differences between these Alternatives.

Alternative E provides for moderately high levels of timber outputs. The Forest would be intensively used and developed, but options for maintaining undeveloped lands and old-growth ecosystems would be retained.

A mix of developed and undeveloped recreation opportunities would be provided. This Alternative would provide for increases in deer and bald eagle populations. Some of the higher potential geothermal areas are available for leasing and others are not.

Scenic quality would be provided along heavily used roads, developed recreation areas, and some roads to trailheads.

Alternative F - Management under Alternative F would be to provide moderate levels of resource outputs. It would provide for intensive use and development of the Forest, but some portions of the Forest would be retained as undeveloped lands and old-growth ecosystems.

A mix of developed and dispersed recreation opportunities would be provided. Emphasis would be placed on maintaining current hunting opportunities and on increasing threatened and endangered species habitat and populations. Some of the higher potential geothermal areas would not be available for leasing.

Scenic quality would be protected along heavily used roads, developed recreation areas, and some roads to trailheads.

Alternative G - The goal of this Alternative is to provide for high levels of amenity values.

This Alternative provides for ecosystem preservation by having significant acres of the roadless areas remain unroaded. Areas available for timber production would be reduced.

A wide range and large amount of recreation opportunities would be provided but emphasis would be on activities not requiring large or sophisticated developed sites such as fishing, tent camping, cross-country skiing, and hiking. Scenic resources would be emphasized along heavily traveled roads and other roads and areas receiving high amounts of recreation use.

Habitat for threatened and endangered plants and wildlife species and old-growth ecosystems would be provided at high levels.

Alternative H - The goal of this Alternative is to maintain high levels of production from lands that are already developed while retaining much of the roadless land in an undeveloped condition.

Intensive timber management practices could be used, but on less area.

A wide range and large amount of recreation opportunities would be provided, but emphasis would be on activities not requiring large or sophisticated developed sites, such as fishing, tent camping, cross-country skiing, and hiking.

Scenic resources would be emphasized along heavily traveled roads and other roads and areas receiving high amounts of recreation use.

Threatened and endangered plants and wildlife species and old-growth ecosystems would be emphasized.

#### Issues of Concern to Klamath County

The Klamath County Planning Staff review assumes that the following are issues of particular concern to Klamath County:

- \* That geothermal leasing, particularly in high potential areas (e.g. KGRA's), be allowed to take place in an environmentally sound manner.
- \* That annual allowable timber sales closely approximate the Resource Planning Act (RPA) target for Deschutes National Forest (i.e. 196 million board feet).
- \* Because of its importance to the local economy, a variety (i.e. developed and undeveloped) of recreational opportunities should be provided and maintained at levels equal to those presently offered.
- \* That deer population closely approximate Oregon Department of Fish and Wildlife objectives (i.e. 24,850), and that bald eagle and osprey habitat be maintained at or above RPA target levels (i.e. 45 bald eagle pairs and 80 osprey pairs).
- \* That personal use firewood be provided at levels which do not interfere with commercial harvesting.
- \* That visual quality be maintained wherever possible, particularly in recreational areas and other areas of intensive visitation.
- \* That annual revenue returns to the Counties closely approximate present levels.

### Alternatives Rejected

After initial staff review, Alternatives A, B, C, D, and G were eliminated from further consideration due to their failure to adequately address aforementioned issues of concern. A listing of Alternatives A, B, C, D, and G's treatment of the issues of concern follows. Tables 1 and 2 summarize the relationship of each alternative to the issues.

#### Alternative A (Current Direction)

This alternative was eliminated primarily because of its failure to address the identified issues of concern, specifically recreation benefits, lack of recognition of Newberry Crater as a KGRA, does not meet ODFW objectives for mule deer populations or RPA targets for bald eagle habitat, timber, or range.

These negative aspects of this alternative tend to outweigh the positive aspects which include: second highest payments to Counties, second lowest budgetary requirements, and third highest allocation of lands for management of scenic qualities.

#### Alternative B (RPA Targets)

Elimination of this Alternative was due primarily to: low returns to Counties (ranked seventh), relatively high budget, leasing of lands within the Newberry Crater, and downward pressure on the employment base due to the greater emphasis on the harvesting of the less labor-intensive Lodgepole Pine (potential loss of 258 jobs).

The only positive note of importance is that this Alternative meets or exceeds RPA targets for recreation, wildlife, timber, and range.

#### Alternative C

This Alternative emphasizes full utilization of the forest resources. As such, this Alternative does not adequately maintain visual quality, does not provide for environmentally sound development of the Newberry

TABLE 1 - Ranking of Alternatives

TABLE 1 - Ranking of Alternatives												
Highest												
Lowest												
RANK												
SUMMARY OF RESULTS RELATED TO KEY ISSUES -												
ISSUE												
Timber												
Million cubic feet average annual allowable sale quantity (ASQ) for the first decade	C	E	H	B	F	D	A	A	A			
Million board feet average annual ASQ for the first decade	C	E	H	B	F	D	A	A	A			
Recreation												
Average annual MRVD's of developed recreation	C	D	E	F	B	A	H	I	A	A		
Average annual MRVD's of dispersed recreation	C	D	E	F	B	A	H	I	A	A		
Planned Campground Construction	C	D	E	F	B	A	H	I	A	A		
Wildlife												
Potential mule deer population	C	D	B	F	E	A	G	H	I	A		
Potential bald eagle population (Pairs)	C	D	B	F	E	A	G	H	I	A		
Potential osprey population (Pairs)	C	D	B	F	E	A	G	H	I	A		
Energy												
M Acres of high potential geothermal areas available for leasing	C	D	E	B	A	F	H	G	A			
Amount of personal use firewood provided	C	D	E	B	A	F	H	G	A			
Social/Economic												
Present net value	C	F	B	E	D	H	A	B	A			
First decade average revenues to the government	C	F	B	E	D	H	A	B	A			
First decade average annual returns to the counties	C	F	B	E	D	H	A	B	A			

TABLE 2

Response to Issues, Concerns and Opportunities								
Alt	Decade 1 Firewood Reserved For Personal Use (M Cords)	Dev Rec (M Acres)	Undev Rec (M Acres)	Visual Quality (M Acres)	OR Dept. F&W Mule Deer Pop Objectives (24,850 Deer)	Acres of High Potential F&W Mule Geothermal Avali For Leasing (M Acres)*	Average Annual First Decade Pay- ments to Counties (\$MM)	Potential Impact on # of Jobs in Local Economy in 1st Decade (# Changed)
A(CD)	60	8.9	57.4	401.8	20,300	85.9	7.2	0
B(RPA)	60	71.8	61.9	365.0	28,600	91.5	5.5	-258
C	0	105.1	1.4	207.4	32,300	126.1	8.7	+550
D	0	98.8	16.2	358.6	29,600	105.0	5.2	-295
E(Pref)	60	79.6	94.8	344.6	25,900	100.0	6.8	21
F	60	74.6	62.8	360.1	27,100	80.3	6.0	-202
G	75	57.4	133.7	426.0	16,700	52.8	6.0	-321
H	75	62.1	121.3	411.9	13,300	62.8	6.6	-84

TABLE 3

Response to Issues, Concerns and Opportunities									
Meets or Exceeds RPA Targets									
Alt	Dev Rec Target (2,050 MRVD)	Disp Rec Target (1,930 MRVD)	Range Target (32 MAUM)	Timber Target (41.9 MMCF)	Timber Target (195 MMBF)	Habitat Improvement Target (6.4 M Acre Equiv.)*	Avg Annual 1st Decade Revenues To Govt (\$MM)	Avg Annual 1st Decade Budget (\$MM)	Present Net Value (\$MM)
A(CD)	1,837	2,036	29	39.6	190	6.2	30.0	17.8	741.3
B(RPA)	2,567	2,388	32	42.0	176	6.4	22.5	20.4	1,124.1
C	3,493	2,688	45	59.8	265	30.0	36.3	23.5	1,285.8
D	2,983	2,551	29	41.3	171	23.5	21.5	20.1	1,121.3
E(Pref)	2,770	2,493	32	46.6	202	27.0	27.1	20.6	1,123.4
F	2,638	2,418	29	39.2	174	30.2	25.9	19.1	1,125.2
G	2,045	2,255	26	32.5	153	16.0	24.8	16.1	861.3
H	2,310	2,220	32	41.7	187	12.5	27.4	20.4	1,027.2

Crater KGRA, and does not provide reserve firewood for personal use on a non-competitive basis. This Alternative also overemphasizes developed recreation (non-motorized trail system would be maintained at or below present levels), and requires a 32 percent increase over current budget levels to implement.

On the positive side, this Alternative projects a potential increase of 550 jobs. This projection is based on maximized timber production and recreational development. Revenues to Counties would also be significantly higher (ranked first).

In summary, despite its strong economic performance, Alternative C may lead to some conflicts and polarization among local communities and other users of the Forest because of its strong commodity development emphasis, and benefits, such as visual quality, recreation diversity, and access to personal use firewood will be at lower standards than they are today.

#### Alternative D

While this Alternative meets or exceeds the recreation and wildlife RPA targets, it falls short on timber and range provisions. This Alternative also ranks low in terms of returns to Counties (down 28 percent from current levels), ranks fifth in budgetary requirements, reserves no firewood for personal use, and projects a loss of 295 jobs.

Positive aspects include provision of adequate mule deer populations, retention of visual qualities, and environmentally sound development of the Newberry Crater KGRA.

#### Alternative G

This Alternative places strong emphasis on visual quality and undeveloped recreation, ranking first in both concerns. These few positive aspects are negligible in light of its failure to adequately address the following:

- \* Developed recreation
- \* Deer population projections (ODFW)

- \* Geothermal leasing (most restrictive)
- \* Low revenues to Counties
- \* Local economic base (projected loss of 321 jobs)

#### Alternatives Recommended for Consideration

Alternatives E, F, and H represent management direction that most closely provide adequate response to issues critical to Klamath County (as identified previously). Some modification within each of these alternatives is felt necessary and is specifically noted in the narrative which follows.

#### Alternative E (Deschutes Forest Service Preferred Alternative)

**Geothermal Leasing:** Alternative E ranks third in terms of acres permitted for geothermal leasing, making available 968,900 acres. Of this total, 568,800 acres are rated as having high or medium resource potential. This Alternative allows leasing on portions of the Newberry Crater KGRA.

**Timber and Range:** First decade average annual timber sales is 202 million board feet, well in excess of the RPA target of 196 million board feet.

This Alternative proposes that 87 percent of the areas tentatively identified as suitable for timber production would be scheduled for harvest. Generally, mature and overmature Lodgepole Pine would be converted to managed stands in 15 to 20 years. In the first decade, 49 percent of the harvest is from Lodgepole Pine stands and 33 percent from Ponderosa Pine stands. This shifts to 42 percent Lodgepole Pine and 29 percent Ponderosa Pine in the second decade. Mixed conifer comprise 18 percent in the first decade and 28 percent in the second. These allocations, with their heavy emphasis on Lodgepole Pine harvest, are assumed to be a result of Pine Beetle infestation concerns.

**Recreation:** Alternative E provides a wide variety of recreation opportunities, both developed and undeveloped.

**Wildlife:** This Alternative exceeds both the ODFW and RPA's objectives for mule deer population. In addition, potential deer population under this Alternative would exceed those under current management. This may translate into more hunting days and related expenditures in the local economy.

Bald Eagles and Osprey: Through habitat management, the potential Bald Eagle population could more than double. However, the potential osprey population under Alternative E would meet RPA objectives, but would be less than half of what current direction provides for.

Firewood: Adequate supplies of personal use firewood are provided on a non-competitive basis (60,000 cords).

Visual Quality. One apparent weakness of this Alternative is its lack of adequate response to visual quality concerns, ranking seventh in allocation of lands for visual management. This is due in part to this Alternative's commodity emphasis and Pine Beetle infestation eradication programs.

Return to Counties: Alternative E provides for the third highest first decade average annual return to the Counties with \$6.8 million (current direction projects \$7.2 million and Alternative C projects an \$8.7 million return).

#### Alternative F

Geothermal Leasing: Although leasing within the Newberry Crater KGRA is allowed (outside the Crater), Alternative F falls short of Alternative E in its provision for geothermal leasing, particularly in high potential areas. In fact, this Alternative fails to meet current management provisions. Accordingly, the geothermal element of this Alternative would have to be modified in order to adequately address Klamath County's position relative to geothermal resource exploration and development.

Timber and Range: First decade average annual timber sales is 174 million board feet, less than the 196 million board feet RPA target. This figure is lower than the current management allowance, following a sustained yield harvest program. Alternative F calls for 41 percent Ponderosa harvest, a slightly higher volume than Alternative E. However, second decade harvests shift to 15 percent Ponderosa, a volume which would be unacceptable in its affect on the local economy. Because of the second decade Ponderosa shortfall,

this provision would have to be modified to meet local economic needs.

Alternative F falls slightly short of RPA targets for range management, although modest shortfall would not seem to warrant modification.

Recreation: Alternative F closely approximates recreational provisions of Alternative E, with the exception of campground construction, where F will meet only 50 percent of demand.

Wildlife: This Alternative exceeds ODFW deer population objectives and meets RPA targets for Bald Eagle and osprey populations.

Firewood: An adequate supply of personal use firewood is provided (60,000 cords annually) on a non-competitive basis.

Visual Quality: Visual quality is provided at a mid-range level, slightly higher than Alternative E, but considerably less than current management directives (360,000 acres vs. 402,000 acres).

Revenues to Counties: First decade average annual return to counties would be less than Alternative E (6.0 million vs. 6.8 million), and substantially less than current revenues (6.0 million vs. 7.2 million). This is due in part to decreased emphasis on valuable Ponderosa harvests and to increased emphasis on developed recreation.

#### Alternative H

Geothermal Leasing: This Alternative is the second most restrictive in promoting the leasing and future development of geothermal resources, allowing only 62,800 acres of "high" potential lands to be made available. Geothermal leasing would not be permitted in a large portion of the Newberry Crater KGRA.

To adequately address perceived Klamath County concerns, this geothermal management program would need to be modified to make more high and medium potential geothermal lands available for leasing.

**Timber and Range:** First decade average annual timber sales is 212 million board feet, exceeding the RPA target by 16 million board feet. This Alternative proposes that 99 percent of the areas tentatively identified as suitable for timber production would be scheduled for harvest. In the first decade, 39 percent of the harvest would be Lodgepole Pine and 42 percent Ponderosa Pine. Second decade harvest shifts to 53 percent Lodgepole Pine and 26 percent Ponderosa Pine.

As in the case in Alternative F, this second decade shortage of Ponderosa Pine is of concern as it may well create downward pressure on the local economic base due to the emphasis on the lesser value Lodgepole Pine.

Management programs for range would be adequate and are similar to those noted for Alternatives E and F.

**Recreation:** This Alternative offers the second highest emphasis of undeveloped recreation of all the alternatives, but only at the expense of providing for future developed recreation needs, including campground construction.

**Wildlife:** The one major weakness noted in this Alternative is its potential mule deer population, which projects only 54 percent of ODFW objectives. This can be attributed to the low emphasis on mule deer habitat enhancement programs.

Alternative H meets or exceeds RPA targets for Bald Eagle and osprey populations.

**Firewood:** More than adequate supplies of personal use firewood are provided on a non-competitive basis (75,000 cords).

**Visual Quality:** Because this Alternative focuses commodity production on previously harvested lands while setting aside roadless areas, visual quality is second highest of all alternatives.

**Returns to Counties:** Alternative H returns the third highest first decade revenues to counties with \$6.6 million. This Alternative, however, requires the third highest budget.

#### Conclusion:

None of the eight alternatives outlined in the Deschutes National Forest "Proposed Land and Resource Management Plan" adequately addresses all concerns as noted previously in this review.

Alternative H, while meeting timber and range objectives and retaining high visual quality, falls significantly short in areas of developed recreation, geothermal leasing, and mule deer population objectives.

Alternative F provides relatively higher volumes of first decade Ponderosa Pine harvest, diverse recreation opportunities, adequate wildlife populations, and personal use firewood. On the negative side, this Alternative is considered restrictive in terms of geothermal leasing, provides for only 50 percent of planned campground construction, projects a loss of 202 jobs, and provides 16 percent less revenues to government (as compared to current management).

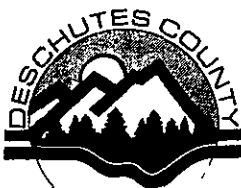
Alternative E provides a balanced multi-use concept, providing for a variety of recreational opportunities, wildlife habitat enhancement, relatively high allocation of lands for geothermal leasing outside of environmentally sensitive areas, schedules 202 million board feet for annual timber sales, generates revenues to government slightly less than current direction, and sets aside adequate amounts of personal use firewood.

Although Alternative E would be the recommendation of Staff, we would encourage a proportionately larger share of Ponderosa Pine be scheduled for harvest, both in the first and second decades. Of the total annual allowable sale, we would recommend that a minimum of 191 million board feet be allocated to Ponderosa, with the remaining allowable sale to be comprised of Lodgepole and other species. Additionally, we encourage the provision of at least 60,000 cords of firewood annually. This proposed modification is an expressed



concern of private timber companies located in central Oregon and is felt necessary to maintain or enhance current economic and employment levels. Emphasis of Lodgepole Pine, with its relative low market value, may result in a continued downward pressure on the central Oregon economic base.

It is assumed that, as a result of this modification, timber revenues, and consequently revenues to counties, would increase accordingly. Klamath County would like to see revenues to counties continue at or above current levels.



## Board of Commissioners

Courthouse Annex / Bend Oregon 97701 / (503) 388-6570

Lois Bristow Prante  
Laurence A Tuttle  
Dick Maudlin

May 8, 1986

Dave Mohla  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Mr. Mohla:

I have spent many hours studying the proposed Land and Resource Plan as outlined by the US Forest Service. I have also attempted to gain as much knowledge as possible from input of environmental responses and the forestry industry. I have also signed a letter to Mr. Lee Coonce, supporting Alternative E as a Deschutes County Commissioner. I would like to express my own opinion in a stronger form than that of the Commission as a group.

The Forest Service has done an excellent job of presenting alternatives for public consumption and awareness. However, it appears that allowable cut of timber is too often a decisive criteria in the alternatives. Allowable cut, in fact, should only be considered when we speak of allowable cut of Ponderosa Pine. Firewood species should not be considered as an allowable cut since it does little or nothing for the timber economy of Deschutes County, except as a fuel source, and minimal return to the Forest Service and the taxpayers.

As nearly as I can ascertain, the Forest Service statistics show 150 MM board feet of Ponderosa Pine is produced each year in areas that are managed for timber harvest. It would seem then that an allowable cut of 120 MM to 125 MM board feet of Ponderosa Pine annually would not only leave an adequate supply as backup, but would, over a period of years, produce growth that could be used in times of increased demand.

With the many pressures brought to bear on the Forest Service from other state and federal agencies, as well as environmental

Mr. Dave Mohla  
May 8, 1986  
Page 2

and timber industry concerns, it is unfortunate that the Forest Service holds in its grasp the economic welfare of an area greatly dependent on the resources owned by the federal government. I am as aware as any public official of certain budgetary cuts for your agency, as well as those we and other public entities are facing. However, it appears that lowering the Ponderosa Pine cut due to this process only compounds the budget crisis, since in our area the Ponderosa pays it's way as does no other specie.

At the present time we are seeing some small but significant increase in demand for construction lumber. I believe this demand will not only continue, but will increase in the next few years. I find it totally inadequate to hold down the allowable cut to such an extent that we get back into the bidding wars of the late 70's that were not only caused by, but certainly added to, that inflationary period. Properly planned, our forests can and will be a part of our region that can be used and re-used by all of us living here now, and also for those who are on their way.

Sincerely,

*Dick Maudlin*  
Dick Maudlin  
Deschutes County Commissioner

DM:ss  
86-201.2



## Community Development Department

City of Bend Annex / Bend Oregon 97701  
(503) 388-6575

May 9 1986

Dave Mohla, Forest Supervisor  
Deschutes National Forest  
1645 N E Highway 20  
Bend, Oregon 97701

Dear Mr Mohla

The Deschutes County Planning Commission would like to make the following comments regarding the Deschutes National Forest Draft Land and Resource Management Plan

- 1 Refusal by the Forest Service to extend the response time, as requested by the Planning Commission, has made it impossible for the commission as a whole to review the plan in detail during this very busy season in our schedule
- 2 The Geothermal Element of the Deschutes County Comprehensive Plan that was adopted on February 13, 1985, should be considered and addressed in the Forest Plan (copy enclosed for your review)
- 3 The Deschutes County/City of Bend River Study completed by the River Task Force Committee should also be considered and addressed in the Forest Plan (copy enclosed for your review)
- 4 The alternative should establish a balance between the economic well-being of the timber industry in Deschutes County and the social and economic values of recreational opportunities in the forest
- 5 The Forest Plan should address the intent of the Deschutes County Comprehensive Plan, which requires the protection of scenic views within one-quarter mile of designated roadways and within 200 feet of rivers and streams

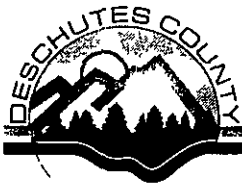
Dave Mohla, Forest Supervisor  
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May 9, 1986

The Planning Division of the Deschutes County Community Development Department would be glad to provide you with any additional ordinances or documents you may wish to review

FOR THE DESCHUTES COUNTY PLANNING COMMISSION,

*Duane Clark*  
Duane Clark, Chairman

DCPC/CJS/sw  
Enclosures



## Community Development Department

Courthouse Annex / Bend, Oregon 97701  
(503) 388-6575

May 9, 1986

Dave Mohla, Forest Supervisor  
U.S. Forest Service  
1645 N E Highway 20  
Bend, Oregon 97701

Dear Mr. Mohla

The Deschutes County Community Development Department, Planning Division, would like to make the following comments in regard to the Deschutes National Forest Draft Land and Resource Management Plan. None of the proposed alternatives in the National Forest Plan address surface mining resources.

The Deschutes County Planning Division is currently updating the surface mining section of the County Comprehensive Plan. Attached is a copy of the current surface mining section of the plan, which describes surface mining in the county and addresses problems which have been identified in the county.

Policy #17 of the current surface mining section states:

"Because the U.S. Forest Service lists aggregate materials as 'common material' and does not make these resources for use, the County shall encourage the USFS to reconsider this policy and provide access to this locally scarce resource."

The primary problem with the County's plan which relates to surface mining resources in the National Forest is the availability of aggregate material. As you can see from the County's current surface mining section of the plan, based upon current known supplies of aggregate material, there may be a shortage in the future of quality aggregate material.

In distinguishing aggregate resources, the County has separated cinders from sand, gravel, and other rock which is of a structural quality. As you are aware, the geology of much of Deschutes County provides large quantities of volcanic material. However, there are relatively small known quantities of gravels and hardrock of a quality which can be crushed and used for structural purposes on private lands. The problem of scarce supply of aggregate resources is compounded by the fact that

Dave Mohla, Forest Supervisor  
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where these resources do exist tends to be in areas which are already heavily populated, creating significant land use conflicts. These problems have been complicated by recent court decisions and changes in the administrative rules of the Land Conservation and Development Commission (LCDC) of the State of Oregon.

As a result of these court cases and changes, the County is being required to reanalyze all surface mining resources of Deschutes County and develop a specific analysis of the environmental, social, economic, and energy consequences (ESEE) of mining at each resource site, taking into consideration conflicting uses. In preparing such an analysis for each identified aggregate site, the County must balance the importance of the specific resource and location with the conflicting uses in the area.

This is difficult, if not impossible, without knowing the quality, quantity, location, and availability of the aggregate resources within the National Forest, which comprises over one-half of the county's area. The current policy of the National Forest is unclear. While private operators may be excluded from mining aggregate, the State and possibly others are allowed to mine. It appears that the State subleases these mines to private contractors for State Highway projects. For example, last year, the Black Butte gravel pit (5017) was operated by Peter Kewitt and Sons for the Highway 20 reconstruction. The availability of the aggregate material in the Deschutes National Forest could have a direct effect on the ESEE analysis which the County must do and on the course of action the County must take to resolve the problems.

An illustration of this problem is Deschutes County file number Z-83-2, which was an application for a zone change for property from Surface Mining Reserve to Surface Mining to allow a mine south of Knott Pit. In this case, the application was for hardrock to be drilled and shot and crushed on the site. One of the contentions of the opponents to the surface mine was that there was a considerable amount of this material readily available which could be mined with less impact. To prove this point, the opponents hired a geologist who prepared a map which indicated numerous hardrock sites within the subject area where a similar resource existed. Several of these sites were located within the Deschutes National Forest. The County approved this application, and it was appealed to the State of Oregon Land Use Board of Appeals (LUBA) who overturned the decision. One of the findings supporting the approval of the application by the County

Dave Mohla, Forest Supervisor  
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was the unavailability of the rock in the National Forest. The case was further appealed to the State Court of Appeals by the applicant, and the Court of Appeals upheld the LUBA decision. Although there were numerous other assignments of error by the courts, one problem cited was the inadequacy of the County's consideration of other available sites in the area.

From the above discussion, I believe you can see the County's problem. This appears to be a significant problem which should be considered by the National Forest Plan. The Planning Division of the Community Development Department would be glad to discuss this issue with you further and provide any additional information which could assist you in this element of the National Forest Resource Management Plan.

Thank you for your consideration of this concern.

Sincerely,

PLANNING DIVISION  
Craig J. Smith, Director

*George Read*

George Read  
Associate Planner

GR/sw  
Enclosure

#### SURFACE MINING

The mining of pumice, cinders, building stone, sand, gravel and crushed rock is an important local industry. Not only does this mining provide employment but it also furnishes products important to the growth of the area. While pumice and cinders have remained in good supply it has been increasingly apparent that good quality aggregate is rapidly disappearing. This is a non-renewable resource that must be protected if the community is to be able to take advantage of the lower costs involved with using local materials.

At the same time, there also have occurred instances where the increasing demand for certain minerals or aggregate has led to mining operators to come into direct conflict with adjacent property owners. The County's previous lax attitude toward allowing rural development has resulted in a number of conflicts between surface mining and adjacent residents. As the area continues to grow, the number of times when residential or other development uses restrict access to mining resources will undoubtedly grow, unless there is adequate planning. This is particularly true for rural development. Adequate surface mining control and reasonable assurance to mining operators of adequate resources have often been controversial issues in Deschutes County. Often surface mines have been "poor neighbors" in residential areas because of their environmental impacts and, sometimes, delayed or incomplete reclamation.

Because mining is a transient use which ends with the depletion of the resource, it is possible to plan for second uses after the mining ends.

Since Deschutes County will have a much larger population by the year 2000, it is important that the mineral and aggregate resources necessary to accommodate that growth be protected, while the County residents be protected from the adverse economic effects of too rapid utilization of the resource and the environmental problems associated with the actual mining operations.

Several estimates have been prepared to provide some general idea as to the amount of aggregate materials that will be needed, as compared to what is known to exist. The first estimate of 13 cubic yards per County resident is based upon an average of the use from 1969 through 1978. The estimate of 15 cubic yards is based upon the average use from 1974 through 1978. The final estimate, 23 cubic yards, is based upon the highest use year during the study period, 1978. These figures are then multiplied by the projected populations for each year to obtain an estimate of the amount of material that will be used. It must be noted that while the population is estimated to rise 4.5 per cent annually, its actual rise will be either higher or lower depending on the year. The

population growth rate in the near future is likely to be faster than it will be in later years, although the real numbers will be higher.

Table 1

Year	Population	<sup>3</sup> 13yd	<sup>3</sup> 15yd	<sup>3</sup> 23yd
1980	53,400	694,200	801,000	1,228,200
1981	55,803	725,439	837,045	1,283,469
1982	58,314	758,082	874,710	1,341,222
1983	60,938	792,194	914,070	1,401,574
1984	63,680	827,840	955,200	1,464,640
1985	66,600	865,800	999,000	1,531,800
1986	69,597	904,761	1,043,955	1,600,731
1987	72,729	945,477	1,090,935	1,672,767
1988	76,002	988,026	1,140,030	1,748,046
1989	79,422	1,032,486	1,191,330	1,827,166
1990	82,900	1,077,700	1,243,500	1,906,700
1991	86,631	1,126,203	1,299,465	1,992,513
1992	90,529	1,176,877	1,357,935	2,082,167
1993	94,603	1,229,839	1,419,045	2,175,869
1994	98,860	1,285,180	1,482,900	2,273,780
1995	103,400	1,344,200	1,551,000	2,378,200
1996	108,053	1,404,689	1,620,795	2,485,219
1997	112,915	1,467,895	1,693,725	2,597,045
1998	117,997	1,533,961	1,796,955	2,713,931
1999	123,306	1,602,978	1,849,590	2,836,038
2000	128,200	1,666,600	1,923,000	2,948,000
Totals		23,450,427	27,058,185	41,489,677

There are approximately 22,105,000 cubic yards of aggregate proposed for SM zoning at existing mining sites, although 16,000,000 cubic yards is owned by one operator. Another 20,570,000 cubic yards is identified for SMR zoning. In addition, another 4,000,000 cubic yards is zoned UAR-10 (mining by conditional use) in the Bend Urban Area. This totals 46,675,000 cubic yards. This is only slightly more available than may be utilized by the year 2000 if we actually consume the material at 23 cubic yards per person. If we consider that one mining operator owns almost half of the known resource and a virtual monopoly by one individual. County controls must recognize the relative scarcity of the aggregate deposits and the possible economic impacts of too rapid utilization and/or the establishment of a monopoly. (Amended by Ordinance 80-203).

The County's goal is:

#### GOAL

To protect and utilize appropriately the mineral and aggregate resource of Deschutes County.

The Surface Mining CAC was one of the first formed and its most active members were mining operators. They originally identified the status of existing mineral and aggregate resources and prepared a series of policies and ordinances (interim and permanent) for use by the County. The interim surface mining ordinance controlled mining until final adoption of the new County Zoning Ordinance. During discussion of the mining policies by the Overall CAC, Planning Commission and Board of County Commissioners, some modifications were made in order to more adequately protect the interests of adjacent property owners and residents, as well as the public need to preserve the mineral and aggregate resources. Yet, these groups also recognized that the mining operators needed to have assurance that the resource sites would be available for mining when needed, for both the operator and public's benefit, and that the reduction of incompatible uses was to everyone's advantage.

#### POLICIES:

1. In order that there is up-to-date information upon which to make informed decisions about local mineral and aggregate resources, an on-going study of the quality, location, quantity and type of mineral and aggregate resources in the County shall be a responsibility of the County Planning Department. Assistance from the State Department of Geology and Mineral Industries shall be sought. To assist in this process, a Surface Mining Committee shall be formed composed of two miners, two non-mining related County residents who live within 1/2 mile of a Surface Mining Zone or Surface Mining Reserve Zone and one at-large member chosen from a list submitted by the other four committee members.
2. Surface mining sites actively being utilized at the time of plan adoption shall be zoned SM, so as to permit continued operation. Operating sites are those which extract 50 or more cubic yards of material within twelve consecutive months. \*However, inactive and undeveloped sites identified in the surface mining inventory shall be designated SMR (Surface Mining Reserve) in order that :
  - (a) Adequate reserves are maintained for future use, and,
  - (b) The sites are easily identified by all concerned.

This protection must include review of and appropriate conditions upon developments on adjoining land to assure compatibility. It shall be assumed land designated SMR will ultimately be mined.

\*Operating sites are those which extract 2,500 or more cubic yards of material within twelve consecutive months.

3. New mining deposits may be designated either SM or SMR. To be designated SM, the site must meet the criteria for initial SMR designation and the criteria for conversion from SMR to SM. If only the initial criteria can be met, then the designation shall be SMR.
4. A new mining deposit not on the existing inventory shall be zoned SMR when.
  - (a) A report is obtained from a certified geologist, engineer/geologist or qualified engineering testing firm verifying the location, type, quality and quantity of the material.
  - (b) Conflict level is 0, I, II or III (IV if there is exceptional community need). In the case of aggregate resource material and exceptional community need and potential shortage based on the currently known supplies of these materials has been identified in this plan.
  - (c) The resource is necessary for future community needs.
5. Changes from a Surface Mining Reserve (SMR) Zone to a Surface Mining (SM) Zone shall occur upon findings by the County that:
  - (a) The site is needed to meet the next five-year resource requirements of the County (not the individual operator whose resource or financial requirements may be met for many years by this one site). In determining the resource requirements, consideration shall be given to population growth, area needs, fluctuations in the construction industry, the amount of materials with active site permits and the sometimes transient nature of mining activities.
  - (b) This site is in the closest proximity to the utilization area, or is otherwise the most economical available at the time. Some withholding of materials by resource owners could require additional area be designated. Also, more than one resource site of a kind should be available in order that a monopoly not occur.
  - (c) As a condition of the zone change approval the operator and/or owner shall submit a site plan (includes a reclamation plan) which is adequate to mitigate the potential conflicts. Operating, reclamation or site plan conditions or standards shall consist of reasonable conditions or standards used in the State to mitigate the adverse environmental and aesthetic effects of surface mining although specific requirements shall vary with the conflict level found to exist at the time. Conflict level IV surface mines shall meet stringent conditions and standards, and these conditions shall exceed those normally used at sites of lesser conflict levels. (Amended by Ordinance 80-203).
- (d) Pumice, cinders or other non-aggregate materials not in scarce supply, which are needed for export in addition to local demand, shall have a lower burden of proof as regards criteria (a) and (b) above. However, sites with a conflict level of IV shall not be used for mining and those of conflict level III shall only be used when no other site is feasible and extraordinary precautions are taken.
- (e) Aggregate resources in conflict level IV areas shall be utilized as soon as a need for the material exists [See 5(a) and (b)] so as to eliminate the conflicts as soon as possible, prevent additional conflicts from developing, avoid uncertainty, remove possible effects on property values, and reclaim the mine area and designate this area for uses which do not conflict with neighboring residences. This provision shall only apply to sites with a conflict level IV at the time of plan adoption by the County. Special restrictions such as off-site processing, limits on the length of concurrent reclamation and time limits on the length of the time mining will be permitted will be required.
6. The operator-applicant must also obtain County approval of a site and reclamation plan, including a phased use and rehabilitation schedule before the area is mined. The site and rehabilitation plan shall return the site to a useful condition and decrease visual and environmental impact of the operation to the extent reasonably possible. This plan must be approved, in writing, by the County Planning Director. Unless utilization of the site begins within two years of the final decision (includes court decisions), the approval of the site and reclamation plan shall expire. Appeals of the site and reclamation plan shall be to the Surface Mining Committee. Further appeal can be taken to the Board of County Commissioners (the Planning Director can request the Board to call up a committee decision for review). (Amended by Ordinance 80-203).
7. In the approval of mining operations the site shall be first utilized for archeological excavation, timber harvesting or other first-use activities and other non-renewable resource conflicts resolved (i.e., historic sites), before mining begins.
8. Once mining and/or associated activities (i.e., rock crushing) have begun, they shall be in accordance with State standards and any more stringent standards that the County may enact. Further, in areas such as F-1 Forestry, residential,

agricultural, wildlife sensitive areas (i.e., nest sites), intensive recreational or other particularly sensitive areas, the mining and associated operations shall be subject to more restrictive standards to keep noise, dust, erosion and other hazards to a level compatible with the adjacent uses. Such standards may include requirements for barrier isolation, setbacks, operating times, concomitant reclamation, limits to active mining area, mining lifetime, water quality, restrictions reasonably related to possible adverse impacts.

9. The criteria for establishing the conflict level shall be as follows (Topography, trees or other natural screening may cause the conflict level to be reduced one level. Also less than four homes will result in the CL being reduced one level).

Level I (Minimal): Four (4) or more homes or an approved subdivision (10 acre or less lots) within 1/2 mile.

Level II (Moderate) Four (4) or more homes or an approved subdivision (10 acre or less lots) within 1/4 mile, but not adjoining the site, or four or more homes located upon the access route to the site.

Level III (Significant): Four (4) or more homes on lots greater than 10 acres or an approved subdivision (lots greater than 10 acres) adjoining the site.

Level IV (Severe): Four (4) or more homes on lots less than 10 acres or an approved subdivision (10 acre or less lots) adjoining the site.

Level 0 (no conflict): Does not meet the requirements for Level I.

10. Although mining should be considered a temporary land use (interim and second uses such as recreation should be designated in the SM zone), it is important that the resource sites be protected from incompatible development. To reduce this problem timely utilization of the product should be encouraged. Also, increased setbacks, screening or other requirements for residential, recreational or other conflicting development on adjacent lands shall be required where feasible.
11. Extraction of mineral and aggregate resources by private landowners for non-commercial use shall conform to the same environmental considerations as commercial operations. The intent is to protect the surrounding area, not to preclude such operations. Such use shall be a conditional use unless the deposit possesses SM zoning.

12. Mining within wilderness and Roadless areas, watersheds, fish and wildlife habitats and recreation areas should be prohibited unless an overwhelming public need can be demonstrated and all other alternatives have been exhausted.

13. The County shall retain in its possession lands it now owns which contain aggregate materials so that this resource will be available for present and future community needs. In order to prevent a monopoly in the future, the County may permit private operators to mine County materials, if the County first determines private mining is more efficient than mining by the County.

14. All property owners whose property is zoned SM because of the initial legislative rezoning resulting from the adoption of this plan, shall furnish to the County Planning Department maps or aerial photographs which provide, to the satisfaction of the Planning Director, an exact identification of the location and extent of the excavation on the resource site within one year of the acknowledgement of this plan. It shall be the responsibility of the Planning Director to inform each affected property owner of this requirement by mail within three months of the Plan's acknowledgment.

15. The County shall encourage the study of using materials which can be substituted for sand and gravel.

16. The county shall consider the preservation of aggregate material in all of its land use actions.

17. Because the U.S. Forest Service lists aggregate materials as "Common Materials" and does not make these resources available for use, the County shall encourage the U.S.F.S. to reconsider this policy and provide access to this locally scarce resource.

#### IDENTIFIED CONFLICT SITES

During the initial hearings on the Plan, three sites generated considerable debate and controversy: (1) the Highland Estates Pit, north of Tumalo; (2) the Klippel Acres Pit, near Johnson Road; and, (3) the Rose Pit, southeast of Bend on Arnold Market Road. Particular attention has been given to these sites and the following policies are established for all three sites:

1. All three pits shall be zoned SMR because resources are known to exist on the sites.
2. No change from SMR to SM shall be permitted except as consistent with Surface Mining Policy number 5. This will be particularly difficult for the Rose Pit since it must demonstrate that the resource is in short supply and the site



is needed to meet a community need, although the conflict level is Level III.

3. No mining shall occur except after a site and reclamation plan has been approved which includes phased mining of the areas, off-site processing (except for a possible 30-day period under unusual circumstances), increasing screening, noise, dust and reclamation of the site, and hours of operation.
4. A neighborhood meeting between the miners and the neighbors shall be sponsored by the County Planning Department so that the extent and conditions under which the mining will occur can be evaluated.

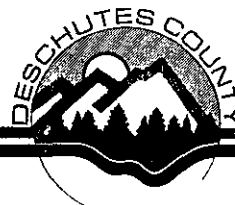
#### FISH AND WILDLIFE

The protection of fish and wildlife resources has been an on-going controversy in Deschutes County. Both those committed to the protection of the resources and those who wish to subdivide or otherwise develop in sensitive wildlife areas have often pressed their positions, sometimes resulting in court action to resolve the conflict.

It is generally recognized that failure to protect fish and wildlife resources will result in loss of habitat and declining species populations due to development pressures, increased numbers of endangered species, declining tourist expenditures, loss of recreational opportunities and loss of quality of life. Already, Deschutes County has witnessed the serious degrading of the cold water fishery by irrigation withdrawals, loss of sensitive deer winter range lands to development and the disturbance of deer migration corridors due to residential and recreational construction.

Testimony by representatives of the Oregon Department of Fish and Wildlife indicated that their studies have shown that there is significant deer migration from the Deschutes National Forest west of the Deschutes River to wintering ranges east of the river identified as the North Paulina Devil's Garden and Hole in the Ground Ranges. They further expressed a belief, based on their training and experience, that rural housing at a density of more than one residence per 40 acres can seriously threaten deer winter survival, and that rural residents often owned dogs which, especially in packs, were a threat to all wildlife.

One type of area of particular concern is the riparian area or wetlands along streams and lakes. These areas not only serve as essential habitat for many species and as migration corridors for big game, but are particularly in need of protection because of their limited nature.



## Board of Commissioners

County House # 1111 Bend Oregon 97701 / (503) 388-6570

Lois Bristow Prante  
Laurence A. Tuttle  
Dick Mauldin

May 9, 1986

Lee F. Coonce  
Deputy Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Re: Proposed Land And Resource Management Plan For  
Deschutes National Forest

Dear Mr. Coonce:

The Deschutes County Board of County Commissioners have reviewed the "Proposed Land and Resource Management Plan for the Deschutes National Forest", and in particular, the "Alternatives" described in the "Draft Environmental Impact Statement". The Board of County Commissioners believes that "Alternative E", with some modification, presents the best resource management plan for the Deschutes National Forest. The Board believes that "Alternative E" should be modified to increase the allowable harvest of ponderosa pine by 20 to 30 million board feet. The Board also believes that "Alternative E" should be modified so that the allowable harvest of dead and dying lodgepole pine should not be used to offset or reduce the allowable harvest of ponderosa pine. These modifications are critical to the wood products industry and the economy of Deschutes County. With housing starts projected to increase this coming year, the timber industry has the opportunity to again flourish and put Oregon's economy back on its feet.

Sincerely,

BOARD OF COUNTY COMMISSIONERS

*Lois Bristow Prante*  
LOIS BRISTOW PRANTE, Chair

*Dick Mauldin*  
DICK MAULDIN, Commissioner

LBP/KHG/lms



P O BOX 431 • BEND, OREGON 97701

May 8, 1986

Mr. David G. Mohla, Supervisor  
Deschutes National Forest  
1645 E. Highway 20  
Bend, OR 97701

Re: Proposed Land & Resource Management Plan  
Deschutes National Forest

Dear Mr. Mohla:

The Bend City Commission, at their regular meeting held May 7, 1986, unanimously adopted a motion to endorse the recommendations of the Bend Chamber of Commerce concerning the Land & Resource Management Plan. Attached you will find a copy of a report submitted to the City Commission that resulted in their action.

Sincerely,

  
Arthur R. Johnson  
City Manager

encl.  
ARJ/sl

MEMO TO: Mayor Stevens & Members of the City Commission

FROM: City Manager Art Johnson

DATE: May 6, 1986

SUBJECT: Proposed Land and Resource Management Plan  
Deschutes National Forest

The Natural Resources Council of the Bend Chamber of Commerce has for the past thirteen months been studying the key issues of the draft of the Deschutes National Forest Management Plan. The committee chaired by Bob Pickard, included the following individuals:

Carol Moorehead, American Lung Association  
Ron Nelson, Central Oregon Irrigation  
Earl Nichols, forestry consultant  
David Rein, Environmental Services  
Dennis Hansen, Bankofier Fincham Githens & Assoc.  
Bob Shimek, Century West Engineering  
Dr. Stan Shepardson, physician  
Ted Young, Diamond International  
Barbara Bagg, farmer  
David Bateman, David Evans & Association  
Jan Bottcher, Water & Energy Resources Services  
Joyce Genna, Chamber Board Member  
Mike Golden, Fish & Wildlife Department  
Mike Lewis, Throop & McKinley  
Greg McClaren, U.S. Forest Service  
Don McNabb, architect  
Jim Mahoney, citizen  
Steve Greer, Economic Development Committee.

On May 1, 1986, at a special meeting of the Chamber of Commerce Executive Committee, the following recommendations of the Natural Resources Council were adopted:

A. To support Forest Preferred Alternative "E" with the following emphasis or modifications:

1. Provide for no decrease in jobs or resource outputs below current levels;
2. Increase the mix of developed and undeveloped opportunities within one hour of Bend;
3. Provide for no geothermal development within the surface area of Newberry Crater;
4. Seek to include all of the Deschutes River within the Deschutes National Forest under an appropriate specific management

designation, to include, but not be limited to, a national wild, scenic or recreation classification

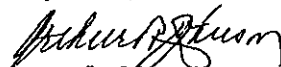
B. In making the recommendations, the Chamber further urges that, when high standards for protection of the Deschutes Forest environment can be maintained, forest planners explore added ways of increasing the economic revenue of the forest as it contributes to Central Oregon's quality of life

A separate statement from the Chamber's Economic Development Council was also adopted by the Executive Board. The statement emphasized the allowable cut of large-log timber, including Ponderosa Pine (logs in excess of 12") during the first two decades of the plan, to provide timber required for profitable operation of the region's saw mills.

Friday, May 9, 1986 is the deadline for responding to the plan. I feel the study by the Chamber is thorough, and involved a cross section of citizens in the community. The recommendation by the Chamber would have added weight if it was also endorsed by the City Commission.

I respectfully request the City Commission consider an endorsement of the Chamber's position.

Respectfully submitted,

  
Arthur R. Johnson  
City Manager

ARJ/sl



## Klamath County ~ Public Works Department

VETERANS MEMORIAL BUILDING — 334 MAIN STREET — 503-882-2501 — KLAMATH FALLS OREGON 97601

April 16, 1986

Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 E  
Bend, OR 97701

Dear Forest Supervisor

The Klamath County Roads Advisory Committee has met and discussed the Deschutes National Forest Management Plan

In review of the Forest Service Preferred Alternative it is noted the sale of lodgepole and ponderosa pine timber types have been altered such that the anticipated revenue to Klamath County will be greatly reduced.

The Klamath County Road Department receives no property tax and must operate and makes all improvements to the County transportation system from National Forest receipts and motor vehicle apportionment. The National Forest receipts comprises a major portion of the Road Department budget

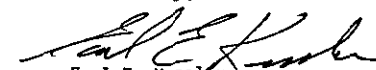
Your proposed reduction in the sale of ponderosa pine will greatly reduce Klamath County's portion of the Deschutes National Forest receipts. This reduction in revenue will reduce the number of road contracts and a loss of jobs within Klamath County

The Roads Advisory Committee recommends the Forest Service maintain the sale of ponderosa pine on the Deschutes National Forest at its present level or increase it to equal previous years sales.

The Committee feels the Central Oregon Alternative is a good proposal to consider.

Thank you very much for the opportunity to respond to your proposed plan.

Yours truly,

  
Earl E. Kessler  
Director of Public Works

EEK 1r1

"Accent on Excellence"



May 8, 1986

David Mohla, Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Mr Mohla.

The purpose of this letter is to encourage you to select a Deschutes National Forest management plan that has a positive economic impact on our local area both in the short and long-range. While we are finally witnessing diversification in economic opportunities in central Oregon — service, trade and tourism especially — we must recognize that the forest products industry is still the backbone for employment and income locally. We all know that as hard jobs increase, there is a ripple effect that causes increased employment in related industries and retail marketing. And, in central Oregon, we know too well that the reverse is also true.

I attended the recent hearing for the Deschutes National Forest management plan that was held at COCC before Congressman Bob Smith, et al. I was not in attendance to testify, but rather to gain some level of understanding of the issues that you are considering and the positions of the special interests groups that are attempting to get "their way". However, I left that session with the feeling that all interests can be recognized while still maximizing the annual yield of Ponderosa pine.

I, too, work in a public industry that faces special interests groups' pressures daily. This causes me to constantly remind myself of the primary mission of public schools and then strive toward compromise positions with the representatives of special interests to assure that the primary mission is not eroded. Congressman Smith stated, in very concise terms, that the primary purpose for the federal government to hold non-wilderness forests is to generate revenue to the federal government and to maximize jobs and income to areas local to national forests.

Forest Supervisor Mohla  
page 2

I encourage you to stand firm on that primary purpose for both short-range and long-range planning for management of our Deschutes National Forest.

Sincerely,

*Al Frickey*

Allan K Frickey  
Assistant Superintendent

a



May 7, 1986

Dave Mohla, Supervisor  
Deschutes National Forest  
1645 E. Highway 20  
Bend, Oregon 97701

RE: Deschutes National Forest Land and Resources Management Plan

Dear Dave,

Committees of the Bend Chamber of Commerce have been studying the elements of forest planning for more than a year and have carefully related that study to the Deschutes National Forest Land and Resources Management Plan that was released in February. While the Chamber's study considered all of the elements included in the plan, and each is important, its principle focus was on the economic impacts.

During the process the staff of the Deschutes National Forest was extremely helpful and all of us were impressed with their skill, knowledge and dedication, and, particularly, by the even handed way they addressed the controversial issues of concern to people with strongly held points of view.

On May 1, 1986 the committees presented recommendations regarding "The Plan" to the Chamber's Board of Directors and they were adopted unanimously by those present. The following then are recommendations to the Regional Forester and the Deschutes Forest Supervisor for consideration in the design of the final plan

I The Bend Chamber of Commerce generally supports the Forest Preferred Alternative E with the following emphasis and/or modifications:

A Provide for no decrease in jobs or resource outputs below current levels

Alternative E calls for a 21 job decrease. The Chamber believes modifications should be made to eliminate this decrease. However, we are also concerned about the mix of jobs. Wood products provide the higher paid job base, when compared to tourist and recreation jobs; therefore, our particular interest is focused on retaining wood products employment.

B. Increase the mix of developed and undeveloped recreation opportunities within a one hour drive of Bend.

Tourism is an increasingly important element in the Central Oregon economy. The forest holds many of the resources that attract recreationers to this area. Included are the Deschutes River, Mt. Bachelor and other winter sports areas, Cascade Highway loop, lakes

-2-

for boating, fishing and swimming, scenic vistas and wildlife, etc. The plan should provide for diversification and expansion of recreational opportunities within this radius.

C. Provide no geothermal development within the surface area of Newberry Crater.

The surface interior of Newberry Crater provides unique and exceptional geologic resources and recreational experiences as well as having high scenic values. The Chamber supports the preservation of this area in its present circumstances. The Newberry Crater area also has great geothermal potential that could provide a long range alternative to nuclear and fossil fuel electrical generation. The Chamber feels very strongly that this potential must be thoroughly explored and that the exploration should not exclude the sub-surface area of the caldera as long as it does not impact the surface.

D. Include all of the Deschutes River that flows within the boundaries of the Deschutes National Forest under appropriate, specific designations that include, but are not limited to, wild and scenic or recreation classifications.

The Deschutes River is a vital resource for Central Oregon. Its waters provide for the vast acreage of irrigated farm lands and residential yards. It is an outstanding recreational resource for fishing, rafting, canoeing and other water activity. It is also a great resource of visual pleasure with its mixture of falls, smooth flowing areas and white water rapids as it passes through timbered lands, marshes and meadows. Actions that preserve these various uses and resources should be a priority in the adopted Forest Plan

Wood products traditionally, at present and for the foreseeable future, are the most important contributor to the Central Oregon economy. The most reliable information indicates that wood products exceed the next largest factor, travel, by at least three to one and possibly as great as four to one. With this in mind, the Bend Chamber of Commerce is very concerned about the future economic vitality of the wood products industry as it relates to the management of the National Forest.

Therefore the following recommendations are presented

II. The Chamber supports the concept of sustained yield that balances the long term timber harvest with the biological capacity of the forest within areas not specifically set aside for non-timbering, i.e., wilderness areas, critical recreation areas, special scenic and wildlife areas. Additions to these non-timbering areas should be minimal and occur only in areas with very extenuating circumstances.

Significant factors should be considered, however, in selecting a timber harvest plan.

A. The plan should emphasize the allowable cut of large log timber (logs in excess of 12"), with special consideration given to ponderosa pine during the ten years of this plan.

Appendix J-81

164 N.W. Hawthorne · Bend, Oregon 97701 · 503-382-3221

Recognizing the necessity of establishing five decade and ten decade cutting cycles, during the first two decades it is essential to provide timber required for the profitable operation of this region's sawmills. This calls for accelerated ponderosa sales during a period of regeneration on private timber lands, growth of second generation trees within the forest and conversions within the industry to handle smaller logs and to create new products and markets.

- B. The timber inventory should be updated as soon as possible and the Forest Plan modified to adjust to the results of the new inventory.

The Chamber has heard conflicting information regarding the accuracy of the inventory now being used and of the renewable capacity of the forest. We believe these issues need to be clarified before the final plan adoption.

- C. Major tree species should be managed separately and an allowable cut be established for each species.

Each species has different economic values, different markets, different growth rates and different management requirements. This leads to the desirability to identify clearly the management and cutting plan for each. This would benefit the planning of local mills and governments.

- D. Fluctuations in the annual sales of ponderosa pine should be minimized and the anticipated sales announced well in advance, thereby allowing the industry a predictable harvest pattern.

Recognizing that it is not practical to put an equal volume of sales up each year, the Chamber does believe that these variables should be minimized. Recent unpredicted decrease in the volume of large log ponderosa pine being offered for sale by the Deschutes National Forest has created a serious situation for this region's wood products industry. The new Forest Plan cannot correct, or even address, this immediate problem, but it should prevent this type of mishap in the future by providing a more predictable offering of sales.

#### III

The Deschutes Forest Plan should be finalized only after a review and consideration of the developing plans within the region's other forest to determine any accumulative effect on the potential timber harvest.

- A. This area's wood products industry is not, and should not be, dependent on any single forest for raw material. A reduction in one forest coupled with reduction in other forests could have a devastating cumulative effect. Only by continuing inter-forest review can all be assured that this potential will be avoided.

#### IV

This final recommendation is separate from the issue of the Forest Plan. It relates to the major decrease in the volume of large log ponderosa pine that has been offered for sale over the last two to three years. As a result, this area's mills have a very serious inventory shortage.

- A. The Chamber believes that the situation calls for an immediate short-term administrative correction which will accommodate the need to rebuild the mill's inventory to a viable level.

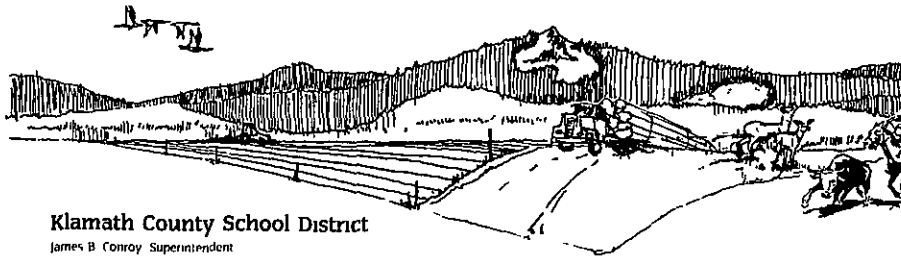
The Bend Chamber of Commerce appreciates the process used to receive input on a matter as important as the Deschutes National Forest Land and Resources Management Plan. Thank you for your consideration of these comments.

Sincerely,



Eric Alexander, President  
Bend Chamber of Commerce

EMP/gc



# Klamath County School District

James B. Conroy Superintendent  
334 Main Street  
Klamath Falls, Oregon 97601  
(503) 883 5000

May 6, 1986

David Mohla, Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, OR 97701

Dear Mr. Mohla

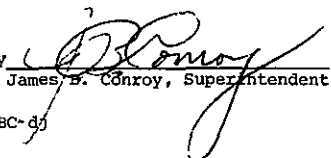
Klamath County School District is vitally interested in the long-range plans being formulated by the national forests in our area. We are very concerned and sensitive to how these plans affect the funding resources of our school district. Timber receipts are a significant part of the school funding resources for Klamath County School District. Be assured that we are in need and appreciative of this source of revenue. It is extremely important to us that the timber receipts for our district remain at the current level and that your plans accommodate a constant level of resource to us each year.

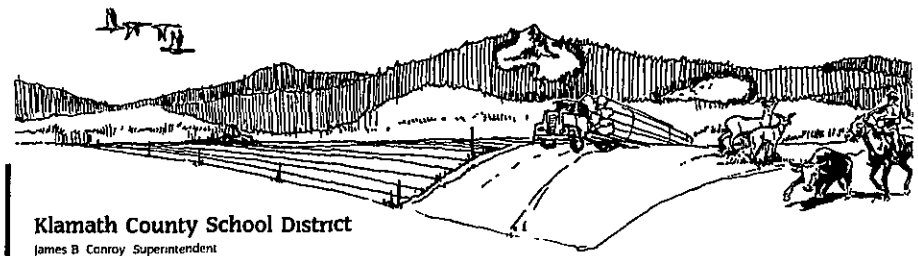
Klamath County School District has no expertise in managing forests. We do appreciate and have faith that you will do the good job. However, we want you to be aware that to develop plans that will reduce revenue to Klamath County School District or cause revenue to fluctuate a significant amount each year does have a serious implication and impact on the educational program of children of our district.

You have a very challenging and complex job and we will appreciate the consideration given to our expressed concern. We sincerely hope your plans will reflect your strong understanding for the value of education in Klamath County.

Sincerely,

Klamath County School District  
Board of Directors

by   
James B. Conroy, Superintendent  
JBC:ds



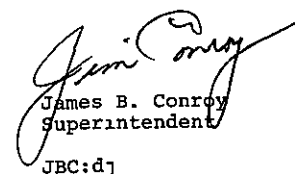
# Klamath County School District

James B. Conroy Superintendent  
334 Main Street  
Klamath Falls, Oregon 97601  
(503) 883 5000

April 15, 1986

TO WHOM IT MAY CONCERN.

As the chief administrative officer of the Klamath County School District, I wish to go on record as opposing any action that would result in a decrease of federal timber revenues coming to the Klamath County School District from the sale of timber and other receipts.

  
James B. Conroy  
Superintendent  
JBC:dj

TOM THROOP  
DESCHUTES AND KLAMATH COUNTIES  
DISTRICT 54

REPLY TO ADDRESS INDICATED

House of Representatives  
Salem, Oregon 97310-1347  
Post Office Box 643  
Bend, Oregon 97709



HOUSE OF REPRESENTATIVES  
SALEM, OREGON  
97310-1347

COMMITTEES  
Chairman  
Revenue  
Member  
Environment and Energy  
Joint Legislative Committee  
on Water Policy

FOREST PLAN COMMENT  
May 8, 1986  
Page 2

May 8, 1986

TO: The Deschutes National Forest Staff  
FR. Representative Tom Throop  
RE: Comment on the Deschutes National Forest Plan

Staff has done an outstanding job in assembling the draft Deschutes National Forest Plan for the public's consideration. I strongly support the general thrust of the preferred alternative, while listing the following suggestions I hope will be incorporated in the final version of the plan.

1. Timber. Over the past decade, the timber cut for ponderosa pine averaged 112 million board feet annually. The Deschutes National Forest staff seems to assert that the lower than expected cut toward the end of the last decade made up for what would have amounted to a significant departure had the cut from the early years of the decade been maintained. I accept this contention, as achieving the concept of sustained yield for ponderosa pine, balancing the long-term timber harvest with the biological capacity of the forest, must be the guiding principle timber management is based upon. Thus, I support the 108 million board feet of allowable cut for ponderosa pine called for in the preferred alternative and would like the following stipulations considered

- 1) A modest priority should be given to large logs in the first couple of decades of the next 50 year cycle in order to help the local mills achieve profitable operations during the transition time required to convert their operations to small logs
- 2) The U.S. Forest Service and the timber industry need to have the flexibility to adjust cut levels throughout the ten year cycle to conform with the economy and federal policy. The annual allowable cut should be considered an average to be achieved by the end of the ten year cycle
- 3) The timber inventory should be updated as soon as possible and the plan modified to adjust to the results of the inventory.

It is terribly unfortunate that over one-half of the timber logged from the Deschutes National Forest now leaves the county. At this time, I have no suggestions on how this significant problem should be addressed, but hope that solutions can be sought in the future.

2. Recreation. The Deschutes National Forest is the primary provider of outdoor recreation opportunities in Central Oregon.

Recreation is Central Oregon's number one growth industry and an integral part of Central Oregon's economic development plan. The Forest must maintain and improve its recreational offerings in the expectations of Central Oregon residents, their visitors, and the tourism industry are to be met. No other public agency can move in to fill the future demands.

Where Oregon may presently be growing at less than 1% annually, Central Oregon will continue to substantially exceed the state's population growth. Though increased recreation value measurements are certainly in order, be cautious about revising downward any future population growth estimates.

Generally, the mix of developed and undeveloped recreation should be increased within an hour of the Forest's population centers. Dispersed recreation, especially primitive and semi-primitive, should not be eroded as is done in the preferred alternative. ORV use is too high and widespread in all alternatives. The result is unacceptably high negative impacts on other dispersed recreation and wildlife.

The enclosed comment provided by the Park and Recreation Division of the Oregon Department of Transportation is superb and I ask you to carefully consider each suggestion made in their analysis

3. Geothermal. I agree with and particularly refer you to the Oregon Department of Energy's testimony which is attached. All public agencies at the federal, state and local levels must agree on the protection of the Newberry volcano area. The Deschutes National Forest Plan in its final version should concur with the state Energy Facility Siting Council and Deschutes County in prohibiting development over the 18,100 acres called for at the state and local levels. The 6800 acres of land in question around the rim of the Newberry Crater should not be subject to development clearly against state and local wishes.

The Plan should not permit geothermal activities in roadless areas, critical fish and wildlife habitat and other ecologically sensitive areas. A map should be included with the final version of the Plan to show which areas have already been leased and which areas are designated as non-lease areas

Geothermal activities do conflict with winter recreation, especially nordic skiing. Winter recreation and geothermal should be treated as separate plan components.

4. Wild and Scenic River Act of 1968. The Deschutes National Forest Plan should recommend the "recreation" classification for the Deschutes River from above Bend to Wickiup Dam. This recommendation has broad-based support (please refer to the Bend Chamber of Commerce comments on the draft plan). State designation is eminent. The "recreation" designation on the Metolius River above Bridge 99 and the "wild" designation below Bridge 99 to Lake Billy Chinook should be recommended. The "recreation" designation should also be recommended for Squaw Creek, or at least the Squaw Creek Corridor should be designated "undeveloped recreation."



TOM THROOP  
DESCHUTES AND KLAMATH COUNTIES  
DISTRICT 54

REPLY TO ADDRESS INDICATED

(1) House of Representatives  
Salem, Oregon 97310 1347

Post Office Box 643  
Br. 1 Or. 97709



HOUSE OF REPRESENTATIVES  
SALEM, OREGON  
97310 1347

May 8, 1986

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FR Representative Tom Throop  
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COMMITTEE  
Chairman  
Revenue  
Member  
Environment and Energy  
Joint Legislative Committee  
on Water Policy

FOREST PLAN COMMENT

May 8, 1986

Page 2

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FOREST PLAN COMMENT

May 8, 1986

Page 3

5. Streamside Rehabilitation. Conditions on the Upper Deschutes River are deplorable and the preferred alternative seems to be of little help. Sediment is destroying spawning areas for wild trout. Timber harvests, road construction, and grazing in riparian zones accelerate the difficulties. Identification, protection, and rehabilitation of key streamside riparian areas must be given a higher priority in the final version of the Plan. The Deschutes National Forest should work closely with the Oregon Department of Fish and Wildlife, the Oregon Water Resources Department, the Oregon Department of Environmental Quality, local governments, and volunteer organizations and individuals to plant soil retentive vegetation and to site instream structures to protect eroding stream banks.

During the next decade, state and local governments and other interested groups and individuals will put together strategies to restore and improve watersheds, wetlands, and riparian areas in the Deschutes Basin. The final version of the Plan should acknowledge this trend and speak to participation in efforts to improve the water resources of the Forest and basin, particularly when Chapter 4 of the Plan asserts the critical importance of riparian zones as wildlife habitat, though they account for less than 1% of the Forest.

6. Wildlife. Generally, the wildlife component of the preferred alternative is done well and seems to place a high priority on sustaining the diversity of the ecosystem. Please refer to the enclosed comment provided by the Oregon Department of Fish and Wildlife. Their testimony is outstanding and should be incorporated into the final version of the Plan.

A permanent reduction in road densities is needed to aid in sustaining healthy populations of most wildlife species

The needs of the Great Gray Owl, the Townsend's Big-eared Bat (soon to be federally listed as threatened), and the Silver-haired Bat need to be more adequately addressed.

The 1/10th mile buffer zone around raptor nest sites is inadequate for most of the larger raptors and should be increased to at least a 1/4 mile for the larger raptors.

And again, ORV use is too high and widespread in all the alternatives and would result in unacceptable negative impacts on wildlife.

Summary. As Chairman of the Oregon House Revenue Committee and the local State Representative, I have had the opportunity to work closely with the State Economist, Ann Nolan Hanus, since her arrival to Oregon in forecasting the state's economy and revenue resources. I was disturbed with her statement in the second paragraph of her comment. "Of greatest importance to the state is its impact on our timber and recreation industries." Both the timber and recreation industries are exceedingly important to the State of Oregon, but so are the other resource values on the Forest. Ms. Hanus concurred by telephone that the state's interest is in seeking balance with all the resource values on the forest.

Again, thank you for a job well done

PEGGY L. JOLIN  
LANE AND DOUGLAS COUNTIES  
DISTRICT 44

REPLY TO ADDRESS INDICATED:

- ☐ House of Representatives  
Salem, Oregon 97310-1347  
☐ 31251 Joe Deer Road  
Cottage Grove, Oregon 97424

COMMITTEES

Vice-Chair: Interim Chair  
Sunset Review  
Member:  
Housing and Urban Development  
State and Federal Affairs



HOUSE OF REPRESENTATIVES  
SALEM, OREGON  
97310-1347

April 22, 1986

Deschutes National Forest Service  
211 NE Revere St.  
Bend, OR 97701

To Whom It May Concern;

Know by the writing of this letter that I join those in support of including funding for paving Carlton Lake Road #204. As you know this is a short stretch (approximately 7 miles) of road connecting the end of Waldo Lake Road pavement to the Century Drive Road pavement.

Respectfully yours,

Peg Jolin  
State Representative  
Dist. #44

cc J T. Breeden

hb

**BOB  
PICKARD**

May 4, 1986

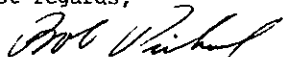
Larry Mullen  
Deschutes National Forest  
1645 E. Highway 20  
Bend, OR 97701

Dear Larry:

I'm writing as an individual regarding my hopes for the Plan to include protection for the Deschutes River. In a general way, I would hope all of the river from its source to where it leaves the Forest would be under some layer of protection, e.g., a national wild, scenic or recreation classification.

Specifically, I would urge the strongest protection for two areas: (1) Benham Falls, (2) the stretch from Pringle Falls to LaPine State Park. The unique nature of both areas deserves whatever strong protection can be written into the Plan.

Best regards,



Bob Pickard



## City of Sisters

150 N FIR STREET • PO BOX 39 • SISTERS OREGON 97759 • (503) 549-6022

May 9, 1986

Larry Mullen  
Deschutes National Forest  
1645 Hwy 20 East  
Bend, Oregon 97701

Dear Larry,

I am writing you in regards to the Preferred Forest Plan Update that will guide Deschutes National Forest for the next few years.

The concern that I and a number of other citizen's in the Sisters community have is that the plan does not address the possibility of a road being constructed from Three Creeks Road on to Mt. Bachelor

I feel that a road connecting Sisters to Mt. Bachelor would be a definite asset to the City of Sisters. However, the reality of this is most likely in the distant future.

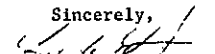
My main concern with the plan is that as it reads now it may preclude the road from being built while this plan is in affect. I believe that it would be in the best interest of the community to allow the road to be built when feasible.

I would like to know how you plan to address the allocation of this road through Deschutes National Forest land if this becomes an issue in the next few years?

If you have any questions please feel free to contact me at 549-6022.

Thank you for your time

Sincerely,



Mayor Linda L. Swearingen

Appendix J-87

State of Oregon  
EMPLOYMENT DIVISION  
Department of Human Resources

TO: Michael D. Staten, Supervisor  
Address: Labor Market Information Programs

Date: March 12, 1986

FROM: M. C. Mahan  
Address: Labor Economist

No. 0062A

Subject: Comment on proposed Deschutes National Forest Land and Resource Management Plan

While time restraints have prohibited a really thorough study of this Plan, several general comments and questions seem in order. The Plan, and its Preferred Alternative, appear to address in a reasonable and comprehensive manner the variety of competing demands placed on this immensely valuable resource. In the case of Deschutes County the satisfaction of the competing demands of timber supply and recreation are of critical importance to both present and future economic well-being.

Recreation/tourism/retirement, much of which development relies on the amenities afforded by the Deschutes NF, is the most rapidly expanding sector of the local economy. Lumber and wood products manufacture remains a critical economic factor in terms of both employment and contribution to personal income, with present employment at record levels. Over the past decade the industry structure locally has undergone extensive change, with sawmill and logging employment recording a loss of more than 250 jobs over the past decade, while remanufacturing has gained over 1200 jobs.

Attempting to analyze the effect on employment of proposed changes in harvest volume and species on the part of the Deschutes NF is difficult. An accurate appraisal would require knowledge of harvest plans for all area resources, both public and private. Overall coordination of timber harvest within a given area could greatly assist in preventing cyclical harvest patterns from developing, or at least assist industry in adapting to changing harvest by volume and species. What are overall harvest and demand patterns within the State? Are we entering another period of rising demand and competition for public timber supplies as the result of a downward cycle in private timber resources? The Plan notes that over the past couple of years a dramatic change has occurred in timber sales on the Deschutes- from over 80% to local processors to only 44% last year. Over the next two decades the Plan calls for a 10% reduction in the harvest volume of Ponderosa pine, but a more than offsetting increase for less-valuable subspecies, particularly lodgepole pine. Will area mills adjust to this change? Note that a Canadian firm has proposed building a chipboard plant in LaPine.

The Plan proposes the development over the next several decades of even-aged stands of Ponderosa pine on commercially designated forest lands. This predicates a shift to clear cutting of tracts of timber, a dramatic change to the selective cutting which has generally governed the harvesting of Ponderosa pine in the past. Yet the Plan contains little discussion of the impact this development might have on recreation, visual attractiveness, wildlife, subspecies suppression and disease.

Following are responses to questions addressed by the State Economist:

1. Community dependency. Table 1 (attached) compares employment and payroll for Deschutes County for 1984. Wood products comprises 13.5% of total employment, and 18.1% of total payroll, pointing up the relatively high pay this industry still affords. Indeed, were the forest service and private forestry services to be included, employment in wood products would be increased by about 500. Although relatively low paying, trade and services provide 45% of all jobs and have shown the most dramatic growth over the past several years. Recreation/tourism has been a major contributor to this growth, now approaching 25% of the trade and service total. Recreation/tourism is also an important factor in construction and finance, insurance, real estate employment through the building of related facilities and their sale and financing. Government comprises 17.5% of total employment, with the Forest Service averaging roughly 400. Agriculture is of diminishing importance in the local economy.

2. Comparison of region to state. Table 2 (Attached) compares statewide payroll and employment for 1984. A comparison of employment percentages by industrial sector between Deschutes County and statewide makes immediately apparent the relative importance of wood products and tourism/recreation in Deschutes. Not only are the County percentages roughly double those of the state as a whole, but higher percentages for construction and finance, insurance, real estate are almost certainly attributable to development associated with tourism/recreation.

3. Impact of changes in species included in harvest totals. Effects on employment of proposed reduced harvest of Ponderosa pine and increased harvest of lodgepole pine is difficult to assess. There are presently only two large mills operating in the Deschutes NF area- DAW and Gilchrist- plus several small mills with a total employment of about 650. Since local mills rely heavily on Ponderosa, a 10% reduction in harvest could result in the loss of 60 or more jobs. However, mills may be able to draw on alternative sources- for example privately owned timber, or Gilchrist can bid on the Winema NF, and DAW recently purchased timber on the Ochoco NF. On the

other hand, it appears that mills outside the area have increasingly competed for sales on the Deschutes NF. At present there appears to be a trend of increasing export, in the form of logs or chips, of less desirable subspecies out of the immediate area. However, existing or new firms could very well build a chip or fiber based product plant in order to better utilize lodgepole and fir resources locally. A best guess would be that an abrupt and substantial cut in Ponderosa harvest on the Deschutes NF could, over the short term at least, result in the loss of 50 to 100 jobs locally. Note that statewide over the past five years, increased productivity and automation have reduced sawmill employment by 30%, a trend that could well continue.

4. Is local planning consistent with greater emphasis on recreation in proposed Deschutes NF Plan? Proposed expansions in motel and resorts are based on a steady and significant increase in recreation/tourism over the next several years, with forest-based activity ranging from skiing to mountain climbing a key attraction. Over the 1986-87 period, if all proposals are carried out, first class rental rooms in the Bend area will increase in number by 200-300. Present and proposed developments on private lands possess considerable potential for expansion. A key question is will the Deschutes NF have the budgetary resources to carry out proposed facility development?

5. Are coefficients used in Table B-V-3 reasonable? Actually, they appear somewhat conservative. Current output generates an employment response, including direct, indirect and induced, of 1566 jobs. In 1985 employment in wood products alone averaged 3100, with wages averaging about \$19,500. Total income estimated per job was about \$25,000. How many of the industry total jobs are generated by Deschutes NF timber is not known, but the area's sizeable millwork industry very likely is a net importer of pine lumber. Using 1977 data in the model, when employment in wood products was only 2690, may also be a problem. Obviously, given the range of possible responses to any changes in harvest policy on the part of the Deschutes NF alone, predictions regarding effects on jobs and income must be highly subjective in nature.

6. Are the population estimates reasonable for the recreation use estimates? Between 1970 and 1980 the population of Oregon grew by 26%, and that of Deschutes County by 100%. However, over the past five years, 1980-1985, the state's population increased by only 1.6%. The Deschutes NF Plan assumes that recreational usage on the Forest will rise at a rate commensurate with that of the state population. The Plan assumes that Oregon's population growth rate will average 2.0% to 2.5% annually. Given the dramatic slowing in population growth over the past five years, the resumption of annual rates of growth in the 2.0 to 2.5% range seems somewhat unlikely in the near future. The extrapolation of past annual

growth rates for recreation usage on the Forest itself might have provided a more reasonable basis for estimation.

7. Should the impacted area be expanded? The Addition of the Gilchrist area to the study would appear to create problems regarding the apportioning of data from Klamath County totals. Given the small change to employment totals for Deschutes County occasioned by the addition of Gilchrist to the study, and the similarity of the mill operation to that of DAW, little other than increased complexity would have been added.

TABLE 1  
DESCHUTES COUNTY  
1984 PAYROLL AND EMPLOYMENT COMPARISON

	PAYROLL (1000 of \$)	% OF TOTAL	WAGE & SALARY EMPLOYMENT	% OF TOTAL
WOOD PRODUCTS	58,985	18.1	3030	13.5
OTHER MFG	19,871	6.1	1200	5.3
RECREAT./TOURISM(1)	(20,920)	(6.4)	(2410)	(10.7)
GOVERNMENT	68,840	21.1	3930	17.5
CONSTRUCTION	23,914	7.3	1180	5.2
TRADE	56,947	17.5	5190	23.1
SERVICES	57,237	17.6	4920	21.9
AGRICULTURE	2,473	0.8	410	1.8
FIN.,INS.,REAL EST.	16,654	5.1	1620	7.2
TRANS.,COMM.,UTIL.	20,919	6.4	1010	4.5
TOTAL	326,000		22,500	

(1) Recreation/tourism included in trade and services totals. Would be a significant component of construction and finance, but not included in estimate. Estimate taken from 'Tourism and Recreation in Deschutes County', dated Sept.1985, prepared by Ragatz Assoc. for the Deschutes County Community Development Department. Estimate is fairly compatible with source cited in Table 2.

OREGON  
1984 PAYROLL AND EMPLOYMENT COMPARISON

	PAYROLL (1000 of \$)	% OF TOTAL	WAGE & SALARY EMPLOYMENT	% OF TOTAL
WOOD PRODUCTS	1,527,308	9.0	66,700	6.6
OTHER MFG	2,980,125	17.5	134,400	13.4
TOURISM(1)	(431,985)	(2.5)	(53,150)	(5.3)
GOVERNMENT	3,409,856	20.0	194,100	19.3
CONSTRUCTION	607,397	3.6	30,200	3.0
TRADE	3,396,564	19.9	253,000	25.1
SERVICES	2,727,346	16.0	204,500	20.3
AGRICULTURE	228,537	1.3	22,420	2.2
FIN,INS,RE	934,394	5.5	65,400	6.5
TRANS,COM,UTIL	1,226,673	7.2	57,100	5.7
TOTAL	17,068,639		1,006,900	

(1) Included in trade and service total. Source: 'The Economic Impact of Travel on Oregon Counties, 1983'. Prepared for OEDD by the U.S. Travel Data Center.



EXECUTIVE ORDER NO. EO - 86 - 06

COORDINATED RESPONSE TO NATIONAL FOREST PLANS

The national forests in Oregon represent 45 percent of all the forests in Oregon, and are vital to the economic as well as the environmental well-being of all Oregonians. The economic stability of many of Oregon's rural communities is dependent upon the timber, fish and wildlife, minerals, and recreation resources provided by the national forests. A large share of the local service businesses, and the financial strength of many statewide firms and local governments are similarly dependent on Oregon's national forests.

The National Forest Management Act requires that management plans be prepared for all national forests. Drafts of these plans are scheduled to be published beginning in January 1986. These plans will establish the management direction for the national forests and will have long-lasting effects on Oregon's economic and social future.

IT IS ORDERED AND DIRECTED

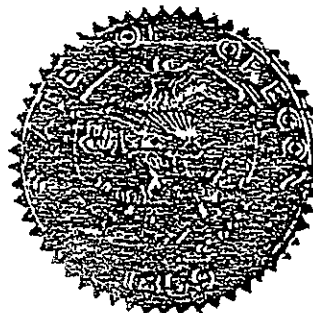
1. A coordinated state response will be prepared for each of the national forest plans and Environmental Impact Statements (EIS) issued for public review and comment during 1986. The state's response will provide a strong expression of close ties between maintaining forest resources productivity and the economic and social well-being of Oregonians.
2. State agencies will provide a response to the Forestry Department for each plan DEIS.
  - a. The following agencies shall assess the effect of each plan's preferred alternative on the ability of the agency to carry out its mission. Also, agencies shall indicate their preferred alternative.


Department of Fish and Wildlife  
Department of Transportation (Parks and Recreation Division)  
Department of Water Resources  
Division of State Lands  
Department of Agriculture (Soil and Water Conservation Division)  
Department of Energy  
Department of Geology and Mineral Industries  
Department of Environmental Quality  
Department of Land Conservation and Development  
Department of Forestry  
Economic Development Department  
State Economist

Executive Order No. EO - 86 - 06  
Coordinated Response to National Forest Plans  
Page 2

- b. The State Economist shall prepare an assessment of the Forest Service's preferred alternatives on each national forest. The Economist shall submit an additional alternative if necessary that reflects the Economist's recommendation on an appropriate alternative for the State of Oregon. The analysis will estimate the effects on employment, personal income and on state and local government revenues and expenditures. In the development and review of the alternatives, the State Economist shall coordinate with the Governor's Council of Economic Advisors, the Economic Development Department, the Employment Division and the Department of Revenue. When necessary, the Economist may call on any state entity which can be of assistance in the development of this information.
3. The Intergovernmental Relations Division of the Executive Department shall coordinate the collection of the individual state agency responses and forward them to the Department of Forestry.
4. The Department of Forestry shall act as lead agency in preparing the coordinated response for the Governor's signature. The Department of Forestry shall attach each individual agency response to the State's coordinated response letter.
5. Agencies shall confer and to the extent possible, shall reach a consensus regarding their position on each plan's preferred alternative. Where consensus cannot be reached, the Governor's response will reflect the official position of the State of Oregon.

Done at Salem, Oregon, this 10<sup>th</sup> day of February, 1986.



  
GOVERNOR

ATTEST:

  
SECRETARY OF STATE



OFFICE OF THE GOVERNOR  
STATE CAPITOL  
SALEM OREGON 97310

May 1, 1986

Lee Coonce  
Acting Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

The State of Oregon appreciates the opportunity to respond to the Deschutes National Forest Draft Environmental Impact Statement (DEIS) and Land and Resource Management Plan (LRMP). A healthy, viable economy in Oregon is heavily dependent upon resources managed by the national forests. Recreational and timber-related employment opportunities are key elements in maintaining the social and economic stability of the area affected by the Deschutes National Forest. The state is committed to active participation in the national forest planning process which will significantly influence the future of Oregon.

Because of the importance of the national forests, I have directed state resource agencies to review the Deschutes plan and report their recommendations to me. Through this coordinated effort, we have identified a wide range of issues. I trust you will fully consider our comments and recommendations in developing your final plan.

From our review, the State of Oregon believes that the preferred alternative (E) can serve as the framework for a supportable management plan. However, there are certain changes in the DEIS and LRMP that should be made. The following seven recommendations have been presented for improving not only the preferred alternative, but the plan in general.

1. State Resource Management Plans - The preferred alternative should more thoroughly demonstrate that the forest meets Oregon's clean air and clean water implementation plans, riparian habitat protection program, fisheries improvement program and the Forestry Program for Oregon.

Lee Coonce  
May 1, 1986  
Page two

2. Local and State Economies - The preferred alternative should maintain or increase social and economic benefits in the forest economic zone of influence by retaining ponderosa pine harvests at the historic 1975-1980 level. Application of this recommendation will provide a necessary stimulus to the local economy.
3. Geothermal Resource - A geothermal and mineral resources plan should be developed which would establish policies and guidelines for managing these important resources and recognize innovative exploration and drilling technology.
4. Wildlife Habitat - A forest road construction and maintenance plan should be included in the preferred alternative that would minimize the effects that essential forest roads have on wildlife habitat.
5. Recreation Resource - Reduced future population growth estimates and increased recreation value measurements will improve the plans accuracy. These changes will not, in our opinion and after consulting with the Regional staff, result in different land or management allocations, nor will it result in changes in overall production of recreation, timber or other resource outputs. Dispersed and developed recreation should be provided at levels more closely matching public demand, in coordination with other resource uses.
6. Personal Firewood Cutting - The state supports the explicit provision of at least 60,000 cords of personal use firewood annually from the Deschutes. However, this volume should not be included as chargeable volume.
7. Coordination with State Agencies - In revising the preferred alternative, the forest should consult with appropriate state agencies on wildlife, air, water, geothermal and recreation resources to make use of available expertise.

Inclusion of these suggested improvements in the Final Plan and EIS will allow Oregon to fully support the Deschutes National Forest Plan. Details on these areas of concern are attached.



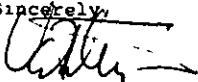
Lee Coonce  
May 1, 1986  
Page three

The Deschutes National Forest is only one of thirteen within Oregon. At such time as the aggregate effect of all of Oregon's national forest plans has been determined, a modification of the state's position and recommendations on individual national forest plans may be necessary.

In summary, the national forests in Oregon play a significant role in affecting the life styles of the citizens of our state. Some quarter of a million jobs in Oregon depend directly and indirectly upon forest resources. In order to maintain these vital benefits, all forest landowners are urged to manage Oregon's forest resources for the greatest benefit of Oregon and the Nation.

The State of Oregon looks forward to working with you in meeting this challenge.

Sincerely,

  
Victor Atiyeh  
Governor

VA:jp

Enclosure

STATE OF OREGON'S COORDINATED  
RESPONSE TO THE DESCHUTES NATIONAL FOREST  
DRAFT ENVIRONMENTAL IMPACT STATEMENT AND  
LAND AND RESOURCE MANAGEMENT PLAN

Summary of Agency Responses

Agency Responses

Department of Fish and Wildlife  
Parks and Recreation Division  
Department of Water Resources  
Division of State Lands  
Department of Agriculture (Soil and Water Conservation)  
Department of Energy  
Department of Geology and Mineral Industries  
Department of Environmental Quality  
Department of Land Conservation and Development  
Department of Forestry  
Economic Development Department  
State Economist

Coordinated Response Format

SUMMARY OF OREGON STATE AGENCIES' COMMENTS  
REGARDING THE DESCHUTES NATIONAL FOREST DRAFT ENVIRONMENTAL IMPACT  
STATEMENT AND LAND AND RESOURCE MANAGEMENT PLAN

INTRODUCTION

National forests in Oregon play an integral role in supplying economic, social and environmental benefits to the citizens of Oregon. Resource values derived from these lands are of vital importance to Oregon.

To show the State of Oregon's commitment to participating in national forest planning, the Governor signed Executive Order EO-86-06. A copy of the Executive Order has been included in this report. The Executive Order requires twelve Oregon state agencies to cooperate in formulating a coordinated response to national forest plans. To facilitate this effort, the Oregon State Forestry Department (OSFD) was directed to be the lead agency for developing the final response to each forest. The Intergovernmental Relations Division (Executive Department) was requested to assist in collecting responses to the plan.

The state's coordinated response was developed following the analysis of each agency's concerns. Coordination meetings were held on both a group and an individual agency basis to discuss the issues. A summary of the major concerns identified by the agencies follows. Individual agency responses are appended to this report.

RESPONSE SUMMARY

Twelve state agencies submitted comments to the Deschutes Draft Environmental Impact Statement (DEIS) and Land and Resource Management Plan (LRMP). Responses were reviewed for content and areas of concern. After the concerns were identified, they were placed into one of four general issue categories:

1. Are Deschutes National forest policies and/or direction in conflict with or inadequately address state policies, rules or mandates?
2. Do technical and/or factual deficiencies or omissions exist in the plan?
3. Does the plan meet the legal requirements of the National Forest Management Act (NFMA) and/or the National Environmental Protection Act (NEPA)?
4. What other general comments or concerns not related to a specific issue have been identified?

From these issue categories, several major problem areas were identified.

1. State Resource Management Plans - Policies inadequately address Oregon's clean air and water implementation plans, riparian habitat protection and fisheries improvement programs and the Forestry Program for Oregon.

2. Local and State Economy - The DEIS and LRMP have not sufficiently considered the effects of the preferred alternative on local and statewide employment levels for recreation and timber related jobs, personal income levels and payments to counties.
3. Geothermal Resources - A comprehensive geothermal and mineral resource plan has not been developed. The Deschutes plan does not include an inventory of potential sites, potential conflicts with other resources and policies for site development.
4. Wildlife Management - Policies and programs regarding forest road construction and maintenance to protect wildlife habitat, especially in lodgepole pine harvest areas, have not been adequately developed.
5. Recreation Resources - Projected high population growth estimates and low recreation value measurements present an inaccurate picture of the recreational demands on the Deschutes National Forest.
6. Personal Firewood Cutting - The plan contemplates provision of personal use firewood from salvage timber; but within the chargeable harvest volume. Even though a demand for 60,000 cords annually is identified, no explicit quantity is guaranteed by the plan.
7. Coordination with State Agencies - The Deschutes National Forest has not utilized state agency expertise regarding management of geothermal and recreation resources and air and water quality.

Additional areas of concern are expressed in the individual agency responses.

ALTERNATIVE SELECTION

Several responding agencies did not recommend a preferred alternative for meeting their goals and mandates. The following list outlines comments received from state agencies who recommended the alternative which would come closest to meeting their policies, goals and mandates.

1. Department of Energy - The preferred alternative (E), treats energy issues fairly well, the one exception being geothermal development at Newberry Crater.
2. Department of Forestry - OSFD does not fully support the preferred alternative (E) even though it is a valid attempt to resolve the issues, concerns and opportunities. Total support for the preferred alternative is contingent upon the forest strengthening efforts supporting Oregon's employment and economic goals.
3. Department of Fish and Wildlife - The alternatives are well thought out with the preferred alternative (E) providing the most reasonable mix of potentially conflicting uses.
4. Department of Water Resource - The alternative management plans all appear to provide forest management practices consistent with sound water resources management.

5. Economic Development Department - Harvest levels projected under the preferred alternative do not support the state's overall economic goals. Some EDD staff recommend alternative (C) which calls for increased harvest levels.
6. State Economist - Alternative (E) is acceptable but needs to be modified in order to meet the state's economic goals.

#### AREAS OF AGREEMENT ON ALTERNATIVE SELECTION

Six of the seven agencies who supplied indepth responses noted a general acceptance of the preferred alternative (E) if certain modifications were incorporated into that alternative. Parks and Recreation Division indicated a preference for an alternative which would depict recreation more favorably.

Subsequent meetings were held with the Fish and Wildlife Department and the Parks and Recreation Division to assure that their concerns were accurately presented in the review.

From the OSFD review of the responses and subsequent meetings with affected agencies, the following major recommendations for changing the preferred alternative were noted:

1. State Resource Management Plan - The preferred alternative should more thoroughly demonstrate that the forest meets Oregon's clean air and water implementation plans, riparian habitat protection, fisheries improvement programs and the Forestry Program for Oregon.
2. Local and State Economics - The preferred alternative should maintain or increase social and economic benefits in the forest economic zone of influence by retaining ponderosa pine harvests at the historic 1975-1980 level. Application of this recommendation will provide necessary stimulus to the local economy.
3. Geothermal Resource - A geothermal and mineral resources plan should be developed which would establish policies and guidelines for managing these important resources and recognize innovative exploration and drilling technology.
4. Wildlife Habitat - A forest road construction and maintenance plan should be included in the preferred alternative that would minimize the effects that essential forest roads have on wildlife habitat.
5. Recreation Resource - Reduced future population growth estimates and increased recreation value measurements will improve the plan's accuracy. These changes will not, in our opinion, after consulting with the Regional staff, result in different land or management regime allocations; nor will it result in changes in overall production of recreation, timber or other resource outputs. Dispersed and developed recreation should be provided at levels more clearly matching public demand, in coordination with other resource uses.

6. Personal Firewood Cutting - The state supports the explicit provision at least 60,000 cords of personal use firewood annually from the Deschutes. However, this volume should not be included as chargeable volume.
7. Coordination with State Agencies - In revising the preferred alternative, the forest should consult with appropriate state agencies on wildlife, air, water, geothermal and recreation resources to make use of available expertise.

Other concerns and recommendations for improvements to the preferred alternative that are not presented here are noted in the individual agency response letters.

The State of Oregon believes that the Deschutes National Forest has made a concerted effort to develop a plan which will meet the needs of the citizens of the state. We believe that a viable plan that will better meet Oregon's needs can be developed by incorporating the recommendations presented in this response.

BB:cn  
5454E



## Department of Environmental Quality

522 SW FIFTH AVENUE, BOX 1780 PORTLAND, OREGON 97207 PHONE (503) 229-5696

H. Mike Miller, State Forester  
Forestry Department  
Office of State Forester  
2600 State Street  
Salem, Oregon 97310

Subject: Draft Environmental Impact Statement for the  
Deschutes National Forest Plan

Dear Mr. Miller:

The Department has reviewed the Draft Environmental Impact Statement (EIS) for the Deschutes National Forest Plan and provides the following comments for the Forest Service to use in preparing the State's coordinated response. These comments are related to air quality and water quality impacts of the proposed plan. The Department does not recommend a "preferred alternative" at this time. The deficiencies outlined below reflect the lack of background information for each of the alternatives which is necessary for the Department of Environmental Quality to evaluate before selecting an alternative. After this information is included in the EIS, the Department would be more capable of recommending a preferred alternative.

Regarding air quality, the Department's main area of concern is that of air quality impacts related to forest prescribed burning. The EIS contains an inadequate technical basis for determining that the plan will have an insignificant impact on air quality. Findings need to be included in the plan regarding planned burning in relation to past burning activities; the impact of the proposal with respect to the Clean Air Act and Oregon Clean Air Implementation Plan requirements; the impact of planned burns on nearby Class I and II areas; the impact of proposed prescribed burning activities on the Visibility Protection Plan; and consistency of the proposed plan on Federal and State environmental policies.

Regarding water quality, the Department's concerns relate to surface water and groundwater quality impacts of tree cutting practices, road construction, chemical handling and usage, sewage disposal and other forest land activities. The EIS does not include adequate technical information to allow water quality impacts to be assessed. Findings need to be made

H. Mike Miller  
Page 2

regarding the consistency of the plan with the provisions of the Clean Water Act; the relationship between baseline water quality conditions and the effects of planned forest activities; water quality monitoring plans; and the different water quality impacts of the alternatives.

Thank you for allowing us the opportunity to review the Draft EIS. The Department looks forward to reviewing the amendments to the Draft EIS before a final recommendation is made regarding the "preferred alternative" Forest Management Plan.

Sincerely,

Fred Hansen  
Director

PH:r  
MR693  
Divisions' Attachment

Appendix J-96

State of Oregon  
Department of Environmental Quality  
Comments on the Draft Environmental Impact Statement  
for the  
Deschutes National Forest Plan

I. Air Quality

This checklist summarizes Department of Environmental Quality, Air Quality Division concerns that should be included in environmental Impact Statements (EIS) for the Deschutes National Forest Plan that was submitted for Department review. This list is not intended to be all inclusive, but should rather be viewed as a framework outlining the major areas which should be addressed in the EIS. Statements which fail to address the concerns listed will be considered inadequate to meet Department approval.

The checklist is organized into 4 major sections, each of which should address the adequacy and consistency of the proposed plan with respect to the following elements:

- A. Attainment and Maintenance of Air Quality Standards
- B. Prevention of Significant Deterioration Requirements
- C. Visibility Protection of Class I areas
- D. Consistency with respect to Federal and State of Oregon environmental policies.

Please note that the Draft EIS for the Deschutes National Forest recently reviewed by the Department failed to provide an adequate technical basis for "Findings of No Significant Impact" (FONSI) statements commonly found in EIS documents. The intent of this checklist is to assure that the need to document such statements is understood.

Current information describing air quality monitoring activities and summarizing air quality conditions across the state may be found in the Air Quality Division's Annual Report. Copies of this report and other information can be obtained by writing to the Division or calling (503) 229-5359. Technical assistance and guidance in the preparation of EISs is available from the Department on request.

1. Forest Planning Impact Analysis

In reviewing forest plans EISs, the principal issue of concern to the Department is that of air quality impacts related to forest prescribed burning. A basic requirement of an EIS is presentation of an analysis of planned burning in relation to past burning activities. Generally,

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if it can be shown that projected annual and daily air pollutant emissions do not exceed, or are expected to be less than that which occurred during the 1978 baseline period (using emission estimation methodology for baseline and future years developed by Sandberg, et al, USDA Forest Service), then issues discussed in Sections 3 and 4 are satisfied and no additional technical analysis of these issues is required. However, for the Deschutes National Forest, 1978 baseline emissions data is not available. The EIS author should contact the Department for guidance. Further, since the Oregon Department of Forestry Smoke Management Plan is the principal instrument under which prescribed fire emissions are managed within the Restricted Area of western Oregon, reference to, and assurances of compliance with Smoke Management Plan Directives, should be included in the EIS.

2. Attainment and Maintenance of Air Quality Standards.

A basic requirement of the EIS is to evaluate the impact of the proposal with respect to Clean Air Act and Oregon Clean Air Implementation Plan requirements. The first issue that must be addressed is that of impacts on air quality standard attainment and maintenance. Specifically, the EIS must show that the proposed action does not cause or significantly contribute to air quality standard violations. Air quality impacts within an attainment area, such as where the Deschutes National Forest is located, must not exceed Prevention of Significant Deterioration (PSD) increments (Table 2) nor may the impacts cause violations of air quality standards (See Annual Report) estimated by summing current air quality conditions and the estimated increment for the appropriate averaging times.

3. Prevention of Significant Deterioration

Part C of the Clean Air Act, requires the Department to insure that pollutant increments in Class I areas (Table 2) do not exceed specific limits adopted by Congress irrespective of the originating source. To assure that these increments are not exceeded due to planned increases in prescribed burning emissions, a technical analysis of the impact of planned burns on nearby Class I areas (see Annual Report) and Class II lands would be required. If the analysis indicates significant impacts, specific quantifiable measures designed to mitigate the impacts must be described in the EIS.

4. Visibility Protection For Class I Areas

The Oregon Visibility Protection Plan requires the protection of visibility within Class I areas during the period of the July 4th weekend to Labor Day, inclusive. Restrictions to prescribed burning within portions of the Restricted Area (See Oregon Smoke Management Plan) apply during this period. The EIS should evaluate the impact of proposed prescribed burning activities on the Visibility Protection Plan specifically with respect to (a) assuring the continued protection of visibility within Class I areas

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from further deterioration and (b) the affect of proposed burning activities on visibility short and long-term control strategies as outlined in the Visibility State Implementation Plan (SIP). Briefly, the SIP restricts prescribed burning within portions of the Oregon Cascades during the protection period (with certain exceptions) and includes designation of Cascade Range Class I areas as "Smoke Sensitive" areas to be protected under the Oregon Smoke Management Plan.

5. Consistency With Federal and State Environmental Policies.

Department policy (OAR 340-20-001) require that Highest and Best Practicable Treatment and Control be applied to pollution sources within Oregon. OAR 340-13-005, Environmental Standard for Wilderness Areas, set forth policy on environmental impacts within wilderness lands while USDA Forest Service Region VI policy (Service Manual No. 2400, Supplement 347, March 1985) requires that, in recognition of the value of forest residues utilization, prescribed burning only be accomplished for those units where all other alternative treatments are unacceptable. The EIS should include a statement addressing the consistency of the proposed plan with respect to these policies, stating the degree to which alternatives to prescribed fire have been considered.

For further information regarding air quality, contact John Core (229-5380).

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Table 1  
Significant Air Quality  
Ambient Air Quality Impacts  
For Nonattainment Areas  
(micrograms per cubic meter)

Pollutant	Annual	24-Hour	8-Hour	3-Hour	1-Hour
SO <sub>2</sub>	1.0	5.0		25.0	
TSP	0.2	1.0			
NO <sub>2</sub>	1.0				
CO *			0.5		2.0

\* Milligrams per cubic meter

Table 2  
Maximum Allowable Increases  
(PSD Increments)  
Micrograms Per Cubic Meter

Class I Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		2.0	5.0		25.0
TSP		5.0	10.0		
Class II Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		20.0	91.0		512.0
TSP		19.0	37.0		
Class III Areas		Annual	24-Hour	8-Hour	3-Hour
Pollutant					
SO <sub>2</sub>		40.0	182.0		700.0
TSP		37.0	75.0		

II. Water Quality

The following are the Department of Environmental Quality (DEQ), Water Quality Division comments on the Proposed Management Plan and Draft Environmental Impact Statement for the Deschutes National Forest. The documents were reviewed within the concept that land management activities have the potential to beneficially or adversely impact the quality of the waters in the forestland downstream of the forest. The management plan has the opportunity to improve existing degraded resources and to maintain or protect existing desired resource conditions. The level of emphasis placed on water quality conditions and the processes used to protect that quality play an important role in providing guidance to the managers in the future on a project-by-project basis.

## 1. Review for Consistency with Provisions of the Clean Water Act

The plan provides a goal statement to protect or improve water quality in the forest. The plan appears to be consistent with the State's nonpoint source (NPS) water quality management plan for the Deschutes River Basin for management objectives. However, the means to assess the plan's ongoing effectiveness during the life of the plan are seriously lacking for the following reasons:

- a) In the Standards and Guidelines chapter of the Plan, there is no specific reference to which water quality standards will be addressed for water quality protection and sewage disposal. In both instances, Oregon's Revised Statutes and Administrative Rules should be cited as the standards to be met.
- b) Discussion of existing water quality and current trends is inadequate considering the public value placed on the forest for visual quality, recreation and water quality. We suggest the plan and EIS emphasize the existing water quality and trends displaying the information in a section in the appendices to the EIS. With the magnitude of the potential impacts that this plan can have on water quality, it is vitally important to display the baseline water quality conditions in some detail prior to implementation of the plan. We are aware of the extensive water monitoring work done in the past by the Forest staff. Results of this work and the problems identified should be displayed in the EIS.
- c) Statements of some water quality problems are made. Are these a priority problem for the forest districts? How will these problems be addressed in a harvest plan? Will an attempt be made to improve the conditions or not allow the problem to get worse? A general statement such as that presented on page 50, item 5(b), does not insure that special considerations in the harvest plan will always be there.

## 2. Review of Water Quality Monitoring Plans

The plan provides guidelines for water quality monitoring of management activities in all management areas. We agree this needs to be done. We would like to emphasize the need to sample a range of management activities and to present the results of the monitoring to the appropriate forest managers. The plan does not display how the results of the monitoring activities will be incorporated in management decisions of the forest. A process should be developed to incorporate results of monitoring activities and other information into future management decisions.

There is no mention of which water quality parameters will be monitored and how the forest intends to determine cumulative impacts on water quality during the life of the plan. Again, due to the high value the public places on the Deschutes Forest for visual and recreational quality, it is important for the forest managers to be aware of existing and developing trends in water quality. Cumulative impact trends should play a vital role in this assessment and subsequent management decision.

## 3. Review of Management Areas and Alternatives

The DEQ made no attempt to determine a preferred alternative for water quality. We recognize this is a land management plan so we were concerned with the various levels of potential water quality impacts from those land activities. We also recognize that differences in management intensity of an activity between alternatives will create varying potential impacts on water quality. Therefore, we do not agree with the EIS's contention that water quality will not vary between alternatives.

Because of our position, we reviewed all alternatives and management area goals and prescriptions with interest towards the degree of potential for water quality impacts and the opportunities available to insure water quality protection. We assumed that the higher the level of soil disturbing activity the greater the potential for problems; also, the greater the encouragement for recreation, the greater the potential for water quality problems.

Water quality management is appropriately considered in management areas 10 (Bend municipal watershed) and 6 (wilderness). Water quality management should be a management prescription in other management area descriptions, especially General Forest (8), Scenic Views (9), and the recreation areas (11, 12, 13, 14). If the prescriptions are emphasized for water quality, as they should be, direct water quality management considerations will change from 11% of the forest (186,042 acres) as in the draft EIS to 81% (1,315,322 acres) of the forest. This establishes the emphasis on water quality that we are seeking in the proposed forest plan.

We are also concerned about the lack of discussion or consideration for small private water systems that might include the national forest as part of its watershed. Are there any such watersheds in the Deschutes National Forest? If so, protection should be provided for them.

#### 4. Review of Plan For Ground Water Quality Protection

The Deschutes National Forest Management Plan and DEIS were reviewed for adequacy to protect ground water quality. The plan virtually ignores the ground water component of the hydrologic cycle. Although ground water probably will be minimally affected by forest management activities, never the less, the plan should recognize the importance of ground water quality protection and mention the following points.

- a) The forest comprises the main recharge area for one of the major aquifers within the State of Oregon.
- b) The water in the streams and lakes in the area is almost entirely from ground water discharge.
- c) Activities that affect ground water quality will eventually affect surface water quality. Conversely, change in surface water quality might reflect in ground water quality.
- d) Lakes with unique pristine water quality may need special ground water protection requirements to prevent nutrient enrichment. Particularly with regard to sewage disposal practices associated with intensive recreational use.
- e) All sewage disposal practices should be in compliance with state requirements. Please state those requirements by reference in the Plan.
- f) Ground water protection planning should be included in all chemical handling practices in the forest. This would include herbicides, pesticides, fertilizers, and degreasing solvents at maintenance shops.
- g) Activities and procedures that minimize erosion, and surface water runoff also will increase infiltration allowing for stable year round stream flows.

For further information regarding water quality, contact John Jackson (229-6035)

WC327



VICTOR ATTYEN  
DIRECTOR

## Department of Land Conservation and Development

1175 COURT STREET N.E. SALEM OREGON 97310-0590 PHONE (503) 378-4926

March 31, 1986

Dave Stere, Director  
Forest Resources Planning  
Department of Forestry  
2600 State Street  
Salem, OR 97310

Dear Dave:

The purpose of this letter is to provide DLCD comments as input into the overall state response to the proposed resources plan and draft environmental impact statement for the Deschutes National Forest.

As you know, the statewide goals and acknowledged comprehensive plans outside Oregon's coastal zone do not have any binding effect over federal resource planning activities like the Forest Service's management plans. Nevertheless, DLCD is quite concerned that the Forest Service's plans clearly demonstrate that such plans (and their various alternatives) are developed to be as compatible as possible with the surrounding communities' acknowledged comprehensive plans.

Our preliminary review reveals that the Deschutes Forest's planning staff has endeavored to produce the resource plan and the DEIS with extensive local involvement. What is lacking, in our opinion, is a more explicit discussion in the USFS documents of the relationships with and projected impacts upon the city and county comprehensive plans by the Deschutes Forest plan. Such information could further assist in strengthening federal-local coordination and hopefully permit easier identification of a preferred management alternative from the state's perspective.

I hope these comments are helpful in preparing Oregon's response to the Forest Service. Please feel free to contact Jim Knight of our office if you have any questions about our remarks.

Sincerely,

  
James F. Ross  
Director

JR:sf  
7891DJ8K/2B

cc: Pat Amedeo  
Brent Lake, DLCD  
Mike Rupp, DLCD  
Patricia Snow, DLCD  
Jim Knight, DLCD





General File #7-2-3-300

*Forestry Department*

**OFFICE OF STATE FORESTER**

2600 STATE STREET, SALEM OREGON 97310 PHONE 378-2560

April 9, 1986

David G. Mohla, Forest Supervisor  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear David,

The Department of Forestry has reviewed the Draft Environmental Impact Statement and Proposed Land and Resource Management Plan for the Deschutes National Forest. Comments on both are attached.

I am pleased with the high level of cooperation provided by the Deschutes planning team. Their efforts to address the Forestry Program for Oregon's objectives and other Department concerns are appreciated. However, our comments point out areas where the Forest's treatment of this important program can be improved.

The Department's review of the DEIS and Management Plan for the Deschutes reveals that the preferred alternative proposed by the Forest is a valid attempt to resolve the issues, concerns and opportunities the Forest has identified. Except for the vital employment and economic goals, the preferred alternative meets the multiple-use principles inherent in the Forestry Program for Oregon. We note that this alternative allows job numbers, personal income and payments to counties to decrease during the life of the plan, even though the potential exists to increase these measures of community stability.

By maintaining historic levels of ponderosa pine volume through modified harvest scheduling, upgrading the Forest's economic analysis and monitoring program, and by eliminating data uncertainty, the preferred alternative could be improved without changing land allocations. The Department would support a recrafted preferred alternative that included these revisions. Without these revisions, the Department would be forced to support Alternative "C".

David G. Mohla  
April 9, 1986  
Page two

Thank you for the opportunity to review and comment on your proposal. We look forward to the opportunity to review the final plan.

Sincerely,

H. Mike Miller  
State Forester

HMM/DM:jp  
Attachment

cc: Board of Forestry  
Fred Graf  
Mike Howard  
Ron Geitgey  
Geology and Mineral Industries  
John Jackson  
Department of Environmental Quality  
Jake Szramek  
Water Resources  
Jim Knight  
DLCD  
Mike Byers  
Energy  
Delores Streeter  
Intergovernmental Relations  
Ed Christie  
State Lands  
Dan Carleson  
Fish and Wildlife  
John Lilly  
Transportation  
Parks and Recreation  
George Stubbett  
Agriculture  
Dave Fiskum  
Economic Development  
Ann Nolan Hanus  
State Economist

Appendix J-101

3/31/86

General File #7-2-3-300

OREGON STATE DEPARTMENT OF FORESTRY  
REVIEW OF THE DESCHUTES NATIONAL FOREST'S  
DRAFT ENVIRONMENTAL IMPACT STATEMENT AND PROPOSED  
LAND AND RESOURCE MANAGEMENT PLAN

The Oregon State Department of Forestry's Resource Planning Section and field staff have reviewed the Deschutes National Forest's Draft Environment Impact Statement (DEIS) and Proposed Land and Resource Management Plan (LMP). Our comments focus on four areas of concern: 1) Compatibility of the Deschutes DEIS and LMP with the basic objectives of the Forestry Program for Oregon (FPFO); 2) Factual errors and omissions in the documents; 3) Legal sufficiency of the documents; and 4) Comparison of the DEIS and LMP view of the future with the Forestry Program for Oregon.

Overall, we found the Deschutes DEIS and LMP to be well organized and presented. In most instances, a thorough analysis of the situation facing the Forest is provided and the decision making process is clear. The preferred alternative is a valid attempt to resolve the issues, concerns and opportunities the Forest has identified. Our review indicates, however, that some important technical errors and potential legal problems exist in these draft documents. Please consider our comments as you prepare the final versions.

COMPATIBILITY OF THE DESCHUTES DEIS AND LMP  
WITH THE BASIC OBJECTIVES OF THE FORESTRY PROGRAM FOR OREGON

Alternative/Objective Comparisons - (DEIS page 221) Table IV-14 compares the DEIS alternatives with objectives of the FPFO. Recognizing that the Department provided compatibility standards after publication of the DEIS, this table incorrectly assigns many of the alternatives to a Level 1 designation. This table should be revised to show a comparison of the alternatives using the new standards. (See the attached revised table)

Assumption Comparisons - The July 15, 1985 Regional direction to the Deschutes required the Forest to provide a table which compares the assumptions used in development of the FPFO with the assumptions used to formulate the DEIS alternative that most closely meets the FPFO objectives (Alternative C). The Department of Forestry was disappointed to find this valuable information has been omitted from the document. To fulfill the NFMA requirements for coordination with state government, this table should be added to the Final Environmental Impact Statement.

Departures - The Department of Forestry supports the use of timber harvest schedules which utilize a departure from nondeclining even-flow. Region 6 direction to the Forest requires consideration of departure alternatives in the following situations:

- When losses from insect attacks can be reduced.
- When fire risks can be reduced.
- When timber harvests from other ownerships are expected to decline.
- To better meet range and wildlife goals
- When the species mix of timber harvests on all ownerships is changing in a way that could adversely affect the economics of local communities.
- To meet FPFO timber harvest targets.

Clearly, all of these conditions exist on the Deschutes. Collectively, they point out the necessity for the preferred alternative to include a departure in order to meet multiple-use goals and maximize public net benefits. However, this departure to accelerate lodgepole pine harvest should not come at the expense of the more valuable ponderosa pine and mixed conifer volume. Harvest of these species should be maintained at or above 1975 to 1982 levels during the life of the plan. We believe that a minor modification of the decadal harvest change constraints while maintaining the preferred alternative's land allocation may be one method to achieve this result.

Agency Coordination - (Appendix, pages 4, 7) The text states that better coordination with the Department of Forestry was a goal to be achieved in the DEIS preparation. We believe this has occurred and the Forest should be commended. However, the table on page 7 minimizes this coordination effort. The many issues presented to the Forest by the Department are not properly acknowledged. This table should be revised to correctly summarize the coordination between our two agencies.

FACTUAL ERRORS AND OMISSIONS IN THE DOCUMENTS

Alternative Graphics - (DEIS, pages 23, 27, 32, 38, 44, 50, 56, 62) The DEIS includes artist's drawings which apparently are intended to show the reviewer what the landscape will look like under each alternative. These visual interpretations are very subjective and nothing in the text explains their meaning. The high commodity alternative is made to look unappealing while the remaining alternatives have very similar and more visually appealing drawings. The use of these drawings in the DEIS is inappropriate since they present a biased, oversimplified viewpoint.

Timber Landbase - (DEIS, pages 24, 28, 33, 39, 45, 51, 57) The description of each alternative includes the percentage of "available" timber production land used in the development of the timber program for that alternative. The term "available" is not clearly defined but is very different from "tentatively suitable". The latter term would be more useful in this analysis. The word "suitable" is used instead of "available" in Alternative 'E', but this is probably an error.

Old-Growth - (DEIS, page 69) Table II-1 shows how the alternatives resolve the issues and concerns facing the Forest. The comparison of how the alternatives maintain old-growth stands is misleading. The percentages of acres retained in old-growth as listed in the table include only those acres available for timber management. The figures don't consider the amount of old-growth already set aside in Wilderness, RNAs and MMRs. Thus, under Alternative C the level of old-growth retained is listed as 0 percent while in reality 8 percent of the total Forest acres contain old-growth stands. The percent of total Forest acres containing old-growth in each alternative would more accurately provide the comparison intended in this table.

This example illustrates a larger problem in National Forest planning. The public has not been fully informed about the wildlife, recreation and scenic values that are currently being produced through land allocations such as wilderness, RNAs, and the OCRA which limit or prohibit timber management. Timber values that have been lost to these and other management designations are not presented in the plan analysis. Therefore, the public cannot easily determine the actual level of values provided by the National Forest, nor can they trace the continued erosion of the commercial forest land base.

To leave out a discussion of the valuable contributions to recreation, wildlife habitat, watershed protection and other non-market values that accrue to the public from legislative and administrative designation and from management strategies that are not decided through the LMP process is doing the public a great disservice and may violate NEPA and NFMA requirements.

Management Areas 3, 4, 5 - (DEIS, page 78) The differences between Management Areas 3, 4 and 5 have not been displayed. These areas are designated to provide habitat for the bald eagles, northern spotted owls, and osprey. Additional information is needed to explain how these land allocations affect timber management.

Table II-3b - (DEIS, pages 102, 186) On page 102, Table II-3b states the high commodity alternative (C) will have a negative effect on air quality. On page 186, the text states air quality will not significantly vary among alternatives. This inconsistency should be clarified. Table II-3b also incorrectly states that wood and forage production will increase under Alternative G. This is not true, based on other data in the DEIS.

Timber Harvest Acres - (DEIS, page 122) Figure XXVIII appears to be in error. Alternative B is shown as having very few acres of timber harvesting, even though it is one of the higher commodity alternatives.

Payments to Counties - (DEIS, page 127) The text states that payments to counties do not decrease during the first decade under the preferred alternative. This is not true, based on the information in Table II-3a.

Forest Influence Zone - (DEIS, pages 180, 181) The Forest Influence Zone for the Deschutes DEIS economic impact analysis is given as Deschutes County. However, in 1983 only 47 percent of the Forest's sale volume was purchased by buyers within Deschutes County. The contribution of the Deschutes National Forest's timber supply to the State of Oregon's economy may be understated if other counties are not included in this analysis. The Department recommends that the Forest Influence Zone be expanded and the economic analysis recalculated to fully reflect the total effect of Deschutes timber on Oregon's economy.

Log Purchase Data - (DEIS, page 181) An incorrect comparison is made here between the percentage of logs bought by Deschutes County mills which come from the Forest and the percentage of timber sold from the Forest which was processed within the county. The percentages given in the text have no relationship.

Road Management - (LMP, page 38) The Department of Fish and Wildlife has expressed concern over the increased harassment of deer and other wildlife and hiding cover losses that may occur following accelerated roading in lodgepole pine salvage areas. This issue has not been adequately addressed in the DEIS or LMP. We acknowledge this ODFW concern and recommend that an innovative road management plan be developed to deal with this potential problem. Through careful yet flexible road designs, reduced road standards, road closures, and public education, both timber and wildlife objectives would be attainable. This creative approach to integrate rather than separate resource uses is also a viable alternative to other management strategies that preclude timber management.

#### LEGAL SUFFICIENCY OF THE DEIS AND LMP

Decision Space - One of the major concerns of the Department of Forestry with the Deschutes DEIS is the inadequate decision space available for timber harvest levels and local economic stability. The decision space for timber harvest levels also does not meet the requirements of the November 10, 1983 Regional direction which calls for at least one alternative to provide a first decade allowable sale quantity which is within 50 percent to 60 percent of the Benchmark No. 7 harvest level. Alternative G has a first decade harvest level which is 64 percent of Benchmark No. 7.

More importantly, we are concerned about the distribution of alternatives within this decision space. Six of the eight alternatives propose similar harvest levels with only the high commodity and high amenity alternatives offering significantly different choices. An opportunity for several additional alternatives, particularly between Alternatives E and C, needs to be addressed. All the alternatives except C will result in a negative effect on the number of jobs. In fact, a broad range of negative job scenarios are presented, ranging from -21 to -321 in the first decade. Why are there no departure alternatives which result in an increase in the number of jobs besides Alternative C which projects an increase of over 500? To some, the high commodity alternative will no doubt be considered a "straw-man" and not a viable alternative. If that is the case, the Deschutes Plan would present no viable alternative that results in a job increase, when in fact the potential remains to do so.

The Department recommends that the DEIS be revised so that alternatives are provided which result in increases of from 100 to 400 jobs with corresponding increases in personal income and payments to counties. Using a constraint for decadal harvest changes of 10 percent, instead of the 5 percent used, may be one method to accomplish this. Land allocations would not be changed and no major effects on wildlife habitat conditions or production of other resource values would be expected to occur. By doing so, the Forest will more completely meet the legal requirement for a full range of alternatives.

Unroaded Area Analysis - The DEIS discussion on unroaded areas does not include information on the timber volumes on these lands and the potential timber harvest levels they could sustain. Also, the decision criteria used to allocate these unroaded areas to management areas in the different alternatives were not explained. A more complete description of the benefits and costs incurred through the development or the retention of each unroaded area is needed.

Data Uncertainty in Planning - Many of the decisions made in the current planning process are based on data which is either outdated, of unknown precision, conflicting with data from other reliable sources, or derived solely from "best professional judgement". Wildlife MMR formulation, predictions of future recreation demand, yield tables, timber inventory, and new land suitability analyses are all areas where a high degree of uncertainty exists in the Deschutes DEIS. In addition, these decisions and assumptions have been finalized and incorporated in all alternatives without the provision of any opportunity for full public review.

It is unacceptable that local, state, and regional economies be faced with major downward changes that result from decisions which are not fully supported by current sound data. Therefore, we recommend that the existing planning direction be continued for those resources until uncertainties in the data can be eliminated through research and on-the-ground verification. Very few, if any, resources would be threatened or irretrievably lost during the ten-year life of the plan if major changes in output levels were postponed until sufficient evidence to justify them is obtained. A well designed monitoring program would protect all resources from unforeseen risks and could incorporate new, reliable information into the plan as it becomes available.

#### COMPARISON OF THE DEIS AND LMP VIEW OF THE FUTURE WITH THE FORESTRY PROGRAM FOR OREGON

Insect and Disease Prevention - (DEIS, page 10) The DEIS should provide more detail on how the different alternatives will affect the potential for future insect and disease problems. Specifically, the Forest should address how future mountain pine beetle outbreaks and possible western spruce budworm problems will be prevented or promoted by the alternatives.

The Department believes the ability to prevent future insect outbreaks is dependent upon the level and intensity of timber management. Alternatives which increase the number of acres that are not managed for their timber resource are more likely to result in future insect epidemics. The Department of Forestry supports utilization of an integrated pest management system and intensive forest management practices in all alternatives.

Management Area 15 - (DEIS, page 88) Justification is needed for the existence of Management Area 15. This management area is intended to preserve old-growth timber for preservation of genetic pools, to provide habitat for old-growth dependent plants and wildlife, and to contribute to the diversity spectrum. However, twelve of the fifteen management areas already have the capability to preserve old-growth for these purposes while fully meeting other needs as well. Why is additional allocation of forest land to old-growth necessary?

**Economic Analysis** - The DEIS has failed to fully address the changing timber supply situation in Oregon. Inventories on private industry lands are falling. Adjacent National Forests will likely be lowering harvest levels as a result of the new plans currently in process. Ponderosa pine availability on all ownerships is decreasing. In light of these trends, it is unrealistic to assume that the Deschutes National Forest faces a horizontal demand curve for timber and that the number of jobs, personal income, and payments to counties will not be affected by these other trends and factors outside the National Forest boundaries. The economic analysis for the DEIS should take into account the dynamic social and economic environment in which the Forest operates instead of maintaining the false premise that the Deschutes is an isolated, independent entity.

**Research** - The future research needs of the Deschutes National Forest have not been discussed in the LMP. As one example, the Department of Forestry believes the Forest should advocate and further the study of opportunities to return some of the 87,400 acres of land with regeneration difficulty to the suitable land base. New technology developed through silvicultural research could provide methods to effectively regenerate and manage these lands, as research programs have and currently are doing in other parts of Oregon.

**Monitoring** - (LMP, pages 118-125) The monitoring program described in the LMP is not clear. Many of the monitored activities do not necessarily contribute to the attainment of forest planning and management goals. Several activities and practices have not been assigned bounds beyond which future evaluation is needed. A process is needed by which the Forest will decide if and when a major plan revision is warranted. The Forest should also address the potential effects of budget limitations on plan performance and the present uncertainty in the Forest yield tables which are likely to be revised in the near future.

The economic parameters to be monitored should be expanded to include employment and personal income in the Forest Influence Zone. Suggested bounds for these parameters are  $\pm 10$  percent. They should be evaluated annually.

#### SUMMARY OF DEPARTMENT RECOMMENDATIONS

The Department of Forestry's review of the Deschutes DEIS and LMP can be summarized by the following list of unresolved problems and Department recommendations:

1. **Problem** - The range of timber harvest levels provided by the alternatives is unevenly distributed. Six of the eight alternatives offer very similar timber harvest levels with only "high commodity" and "high amenity" alternatives offering significantly different levels.

**Recommendation** - The Deschutes should consider additional alternatives or modify the preferred alternative to provide a broader choice of timber harvest levels. Alternatives which provide for a range of increased employment, income and county returns are especially needed. Maintaining ponderosa pine and other non-lodgepole volume at or above 1975 to 1982 levels during the life of the plan is also recommended.

2. **Problem** - The economic analysis conducted by the Forest fails to address the timber supply situation on adjacent ownerships and does not recognize the full effect of the Forest's actions on the State's economy

**Recommendation** - The economic analysis should be expanded to include counties adjacent to Deschutes County which are affected by the Forest. The actions of adjacent federal and private timber suppliers and the resulting effect on the local and State economies should also be included in this analysis.

3. **Problem** - The Forest's proposed system for monitoring and evaluating the performance of the plan is incomplete. The economic effects of the plan are not fully considered.

**Recommendation** - The Deschutes has asked for public input to improve its monitoring program. The Department plans to be actively involved in this process.

4. **Problem** - Planning assumptions based on uncertain data may be needlessly threatening local, state, and regional economies.

**Recommendation** - Existing planning direction should be continued for those resources where high uncertainty on the effects of or the course of future management exists. The Forest should conduct needed research and monitoring to determine if a change in current management assumptions is needed.

DM:jp

2/86

TABLE

DESCHUTES NATIONAL FOREST

RELATIONSHIP OF THE PROPOSED ACTION AND ALTERNATIVES  
TO THE BASIC OBJECTIVES OF THE FORESTRY PROGRAM FOR OREGON

Basic Objective	Proposed Action and Alternatives			Discussion
	Level 1 <sup>1/</sup>	Level 2 <sup>2/</sup>	Level 3 <sup>3/</sup>	
To maintain the maximum potential commercial Forest land base consistent with other resource uses while assuring environmental quality.		A B C D E F H	G	Congressional Acts and Executive Orders (see Purpose and Need section) and State law (Oregon Forest Practices Act) mandate management guidelines for certain lands. Incorporated throughout the planning process, these guidelines have served to define the suitable land for timber production that is compatible with the objective.
To identify and implement economically feasible levels of intensive forest management required to achieve cost effective growth and harvest		A B C D E F H	G	A full range of intensive timber management practices (refer to Management Strategies and Management Area Direction, this chapter) is utilized for timber production. New and improved practices would be implemented consistent with technological advances.
To maintain community stability by remaining flexible for increases in future harvest levels that would offset projected shortages.	A C	B D E F H	G	Deviation from even-flow sustained yield management would be implemented consistent with NFMA regulations and Forest Plan direction. This involves the harvest of available surplus old-growth inventory to offset projected shortages.

1/ Meets share of FPFO target level and is compatible with basic objective.

2/ Is compatible with the basic objective but does not meet target level or meets the target level but is not compatible with the basic objective.

3/ Does not meet target level and is not compatible with the basic objective.

NOTE: Only Alternative C meets the FPFO target harvest levels in all decades. Alternatives A, B, D, E, F, and H meet the target levels in from one to four decades. Alternative G fails to meet the target levels in any decade

March 28, 1986



Ann Nolan Hanus, State Economist  
Executive Department  
151 Cottage NE  
Salem, Oregon 97310

Dear Ann:

Enclosed are the answers to the questions you asked concerning the  
Deschutes National Forest Plan.

In preparing our response we have consulted informally with the following  
persons: Jesse Butler, Central Oregon Intergovernmental Association;  
Bill Anthony, U.S. Forest Service; Jim Giesenger, Western Wood Products  
Industry, Ted Young, Diamond International; and David Morman, Oregon  
Forestry Department, as well as Economic Development Department staff.

When reviewing the other 13 plans, I will direct our Regional Managers to  
obtain local comments. Unfortunately, we did not have time to do so for  
the Deschutes Plan. However, as you may know, U.S. Representative Bob  
Smith is planning a public hearing in the area this month. This  
mechanism should provide a forum for local comments.

In this response, I have focused on the issues inherent in the standard  
questions. Thus, this does not deal with some other issues that may be  
of interest to you and that may be mentioned by other reviewing  
agencies. Because of their relationship to economic development, I am  
taking the liberty of simply listing them here. They are, (1) the fact  
that the federal budget for FY 1987 calls for a two-thirds reduction in  
funds returned to counties from federal timber sales within their  
boundaries; (2) the affect of FY 1987 budget cuts on the various  
Deschutes Forest Plan alternatives; (3) the resolution of roadless area  
issues which have been festering since the RARE II process several years  
ago; (4) and the process of finding other sources of revenue to finance  
timber management on federal forest lands, including the option of  
investing a fixed percentage of timber sale revenue in timber management.



Victor Ailyeh  
Governor

Ann Nolan Hanus, State Economist  
March 28, 1986  
Page 2

Finally, as the answer to question #3 indicates, we question the Forest  
Service methodology which apparently assumes that timber management and  
recreational use are mutually exclusive. This is not always the case;  
thus, the Forest Service should take possible compatibility into account  
in its planning process.

Thanks, Ann, for the chance to contribute to your analysis. Sorry for  
being a few days late. We will be on time next time.

Sincerely,

Thomas F. Kennedy  
Director

TFK:jwh  
8807F

March 31, 1986

# OREGON

ECONOMIC  
DEVELOPMENT  
DEPARTMENT

505 Cottage Street, NE  
Salem, Oregon 97301 U.S.A  
Telephone (503) 373-1200

Telex: 821481  
Cable: ORECONDEV  
FAX (503) 581-5115

TO: Ann Nolan Hanus, State Economist  
FROM: Thomas F. Kennedy, Director  
Economic Development Department  
SUBJECT: Deschutes National Forest Plan Review

## Overview

There are two major sawmills operating in the forest influence zone of this plan, one in Bend and one in Gilchrist. In addition, Prineville has one major sawmill and five smaller sawmills. Together, these mills have an estimated installed capacity on a two-shift level of about 460 million board feet per year. Of this capacity, 77 million board feet represent capacity for small logs. Also, a veneer plant which has a capacity of 50 million board feet is located in Redmond.

The Bend mill and the Gilchrist Timber Company are both modern plants. Until 1979, these mills imported logs from the Klamath County National Forest areas. Since then, timber from this area has been unavailable to these mills. Northern California and mills in Western Oregon have bid Klamath timber away from the Deschutes area. In addition, mills in California and Western Oregon have bid on Deschutes timber. This trend is expected to continue.

In terms of development, one company is considering the addition of a new waferboard mill in the Bend area because of the availability of the lodgepole pine resource. At buildout, the mill would employ 50 to 75 persons and represent a total investment of \$10 to \$15 million.

## Questions/Answers

1. Is the preferred alternative (Alternative E) consistent with the state's economic development strategy?



Victor Adiyeh  
Governor

Ann Nolan Hanus, State Economist  
March 31, 1986  
Page 2

The state's overall economic goal is to assist Oregon's existing businesses to expand, and to attract new businesses to the state. Various strategies are in plan to achieve this goal, including support for the development of secondary wood products manufacturing. We would be more satisfied with an alternative that made more timber available to be harvested.

For reasons explained below, we believe recreational uses are more than adequately accounted for. Thus, increasing the allowable harvest would not, in our judgment, tip the balance against recreation.

Our support for a higher allowable harvest is rooted in the forest industry's estimate of maximum sustainable yield in the Deschutes National Forest, given the most favorable land use mix for harvesting ponderosa pine. The sustainable yield could be as high as 160 million board feet per year. The preferred alternative, by contrast, calls for harvesting 108 million board feet per year. This situation is compounded by the fact that, since 1979, mills in the Deschutes area have not had access to timber in the Klamath National Forest, thus increasing bidding for available Deschutes timber.

Unless more timber is made available, we believe there could be some plant cutbacks. Put positively, more available timber in this region could be used by the industry and by the state as a marketing and sales tool to promote development.

Some staff in the Economic Development Department support Alternative C in the Forest Service plan. This calls for a substantial increase in the harvest of ponderosa pine. I do not believe this option will be seriously considered in the political arena because it is not balanced. Thus, the Department supports asking the Forest Service to examine the feasibility of an alternative, not now proposed, that would increase the harvest of ponderosa pine, but that would not accomplish this at the expense of recreational uses.

2. What are the significant economic development effects of the preferred alternative on various sectors of the economy?

Provisions in the plan for recreation/tourism may be out of balance because they overestimate Oregon's population growth. The Forest Service estimates a 2.0 per cent annual growth rate; the actual growth rate for Oregon is running more realistically at 0.8 per cent annually.

We also advocate that the Forest Service grant a variance that would allow an increase in the allowable harvest of lodgepole pine. Many stands are dying and must be harvested or they will be lost.



Ann Nolan Hanus, State Economist  
March 31, 1986  
Page 3

An increase in harvestable lodgepole pine, coupled with a small increase in the allowable harvest of ponderosa, linked to the population growth estimate described above, would have the potential of stimulating the economy of the Deschutes region.

3. Do you agree with the economic assumptions as they relate to economic development?

Time has not permitted a close analysis of all the economic assumptions made by the Forest Service. We do take issue, as outlined above, to the population growth estimate. We also suggest that the Forest Service has made a faulty assumption contending that timber management and recreational use are mutually exclusive.

4. Do local economic development authorities agree with the direction of the plan? What are their comments?

Local review of the plan is now under way, and will not be completed until May 2. Meanwhile, the public hearing planned by U.S. Representative Bob Smith for April 3 should shed light on local perceptions.

5. What sort of economic development opportunities would the plan generate or inhibit? What actions can the state take to augment or counter the anticipated effects of the plan?

By itself, the plan would not generate economic development opportunities. Limiting the allowable harvest of ponderosa pine limits the raw material available to mills in the area. At the level specified in the plan, the allowable harvest of lodgepole pine would allow the proposed new waferboard plant to be built, though the company considering the investment may find Canadian sites more attractive and has concerns about a long term resource. Much of the existing lodgepole pine resource is expected to go for firewood.

There is not much the state can do to counter the anticipated effects of this plan. That is why we advocate that the Forest Service develop a new alternative that increases the allowable harvest for the reasons enumerated above.

DNF:p1  
8846F



STATE OF OREGON

INTEROFFICE MEMO

Mike Miller

-2-

March 31, 1986

TO Mike Miller, State Forester

DATE March 31, 1986

FROM Ann Nolan Manus, State Economist  
Office of Economic Analysis

SUBJECT Summary of Findings and Recommendations for the Deschutes National Forest Plan

I have reviewed the Draft Environmental Impact Statement (DEIS) for the Deschutes National Forest Plan. I have appreciated the assistance of your staff, especially Dave Stere and Gary Lettman. The Employment Division, Economic Development Department, and Department of Revenue also provided data and analyses that were critical for compiling this report. I have attached the reports that I received from the Employment Division and the Economic Development Department for your information. Furthermore, I discussed the plan's impact with local government officials, industry representatives, U.S. Forest Service planners, and various groups and associations.

The Forest Service has attempted to provide a range of alternatives dealing with how the Deschutes Forest will be used in the next decade. Of greatest importance to the state is its impact on our timber and recreational industries. The Forest Service has selected Alternative E as its preferred plan among its eight alternative plans.

The Forest Service should modify its preferred Alternative E to take the following into consideration:

1. The Forest Service should alter its first and second decade harvest schedules so that the accelerated harvest of the Lodgepole pine is not done at the expense of the Ponderosa Pine harvest. A less ambitious Lodgepole pine harvest would permit a more level harvesting schedule and, therefore, a moderately increased Ponderosa Pine harvest. This would ease supply pressures on local mills and may counteract potential job losses.
2. The Forest Service should consider its proposed harvest levels for Deschutes National Forest in conjunction with those proposed by other National Forests, the BLM, and private lands. The cumulative effects of harvest plans may have major ramifications for Oregon's lumber and wood industry. Similarly, the market effects of proposed harvest levels should also be analyzed.
3. Every effort should be made to conduct a thorough inventory of the timber available by species and maturity on both public and private lands. It is extremely difficult to determine what Oregon's actual total supply is and whether the state has the capability for expansion of its output. As a result, it is difficult to assess whether proposed harvest changes on the Deschutes can be offset by other sources. Recent studies have indicated that private landowners may have declining yields over the next ten to fifteen years, before they begin to increase.

4. The Forest Service should widen its scope of economic and social analysis to include the entire state of Oregon rather than just Deschutes County. Since over one-half of the timber logged from the Deschutes National Forest now leaves the county, other areas of the state are also deeply affected by Deschutes National Forest.
5. The Forest Service's recreation estimates should be revised downward to reflect more conservative Oregon population growth rates. The Forest Service is projecting a two percent annual growth rate, compared to our 0.7 percent rate.
6. Local governments will receive 5.5 percent less revenue in terms of gross receipts under the Forest Service's preferred Alternative E compared to the current direction Alternative A. Reduced revenues would adversely affect the schools and road maintenance programs of Deschutes, Klamath, Lake, and Jefferson counties. Also, the Forest Service should correct its Figure XXXIII and statements made in its Draft Environmental Impact Statement implying that the counties' receipts would not be reduced (refer to p. 127 of the Draft Environmental Impact Statement). These reductions would be coming at a time when the President's budget would also be substantially reducing the counties' receipts.
7. Under preferred Alternative E, the Deschutes National Forest would need a 16 percent increase in their current budget in order to implement its plan. In light of Gramm-Rudman and probable upcoming federal budget cuts, it is questionable whether they can expect to receive the full amount of these funds. The Forest Service should address this issue directly in the Plan since major budgetary changes could significantly affect its final configuration.
8. The Forest Service may want to consider some flexibility in the timing of geothermal exploration and drilling depending upon the fluctuation of oil prices.

AMH:ef  
0178j

Attachments

cc: Jon Yunker  
Thomas Kennedy  
Don Steward

Pat Amedeo  
Richard Munn

Appendix J-110



VICTOR ATTYEN  
GOVERNOR

## Department of Energy

LABOR & INDUSTRIES BUILDING, ROOM 102, SALEM, OREGON 97310-0831 PHONE 378-4040  
TOLL FREE 1-800-221-8035

Mike Miller  
March 28, 1986  
Page 2

TO Mike Miller, State Forester DATE March 28, 1986

FROM Lynn Frank, Director

SUBJECT: ODOE comments on the Deschutes NF Plan and DEIS

This is in response to Executive Order EO-86-06 regarding the areas of ODOE interest in the Deschutes National Forest proposed plan and draft EIS. The preferred alternative (E) of the DEIS treats energy (specifically geothermal) fairly but is unclear regarding a focus of interest, Newberry volcano. Therefore, ODOE believes the adopted alternative should treat geothermal development at Newberry as we suggest below.

### Concern No 1 Areas that prohibit or limit geothermal development

The proposed plan addresses only the Newberry volcano area in any detail. A map of the area in question is attached. The Forest Service proposes not issuing geothermal leases on approximately 11,300 acres in the interior of Newberry crater. Both EFSC and Deschutes County adopted rules prohibiting development over a larger area, approximately 18,100 acres in size. Therefore 6800 acres of land around the rim of Newberry crater appears to be subject to development according to the plan, against state and local wishes.

We suggest that the Forest Service adopt the EFSC/Deschutes County boundary in whatever alternative they adopt for the following reasons:

- 1 A scenic buffer for Paulina Peak visitors is provided
- 2 The Forest Service admits in the plan that development restrictions in the rim area "will likely apply" anyway
- 3 A clear signal will be sent to developers that all public agencies agree on protection of the crater and its immediate environs

### Concern No 2 Use of existing or future transmission corridors

Transmission line siting is only minimally addressed. However, this is appropriate. The Plan cannot at this time predict how many new transmission lines will be needed. It depends on the number of new resources which will need to be connected to the grid. The Plan does not separate out the amount of land projected for transmission lines from other non-timber uses.

The goal for transmission line planning is to minimize environmental impacts. This includes locating transmission lines outside sensitive areas like "Old Growth" forest and avoiding impacts to birds of prey in areas important for them.

Our concern is that adequate transmission line capacity can be sited in an acceptable manner to service the needs of future resources. We do not know how much transmission line capacity will be needed. Given that limitation, we conclude the Plan in general adequately allows for transmission line planning. However, the Plan should reflect that existing transmission corridors will be used for new transmission line capacity where possible.

LF:as  
690-Imemos (D1,F2)

General File #7-2-3-300



VICTOR ATTYEH  
GOVERNOR

Forestry Department

OFFICE OF STATE FORESTER

2600 STATE STREET SALEM, OREGON 97310 PHONE 378-2560

June 2, 1986

Larry Mullen  
Deschutes National Forest  
1645 Highway 20 East  
Bend, Oregon 97701

Dear Larry,

Enclosed is a letter we received from the Department of Transportation, Highway Division. Greg McClaren from your office indicated that it would be best to forward this response on to you.

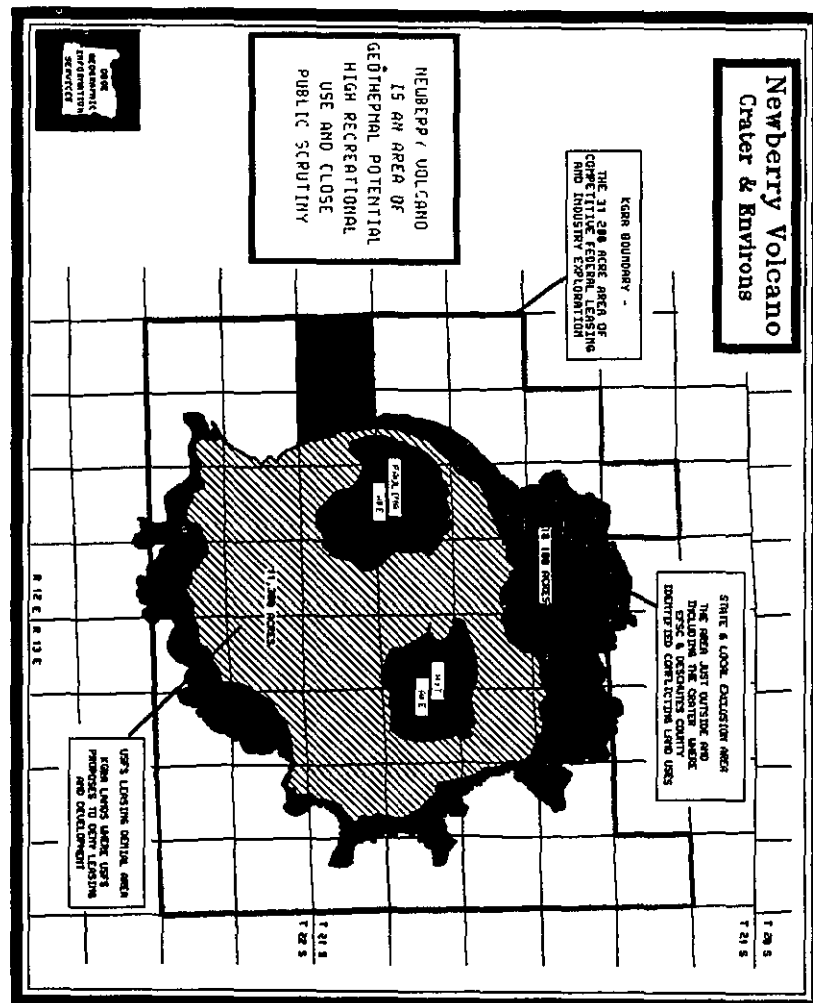
The comments from the Highway Division would not have changed the state's coordinated response to the Deschutes National Forest Plan. I will encourage them to submit their response with that of the Parks and Recreation Division of the Department of Transportation.

If you have any questions please give me a call.

Sincerely,

David H. Stere, Director  
Forest Resources Planning

DHS:jpb  
Attachment





## Department of Transportation

TRANSPORTATION BUILDING, SALEM, OREGON 97310

In Reply Refer To  
File No

DATE: May 14, 1986

TO: H. Mike Miller, State Forester  
Forestry Department

PLA

FROM: Robert N. Bothman  
Deputy Director

SUBJECT: "Proposed Land and Resource Management Plan"

The Oregon Department of Transportation, Highway Division, has reviewed the "Proposed Land and Resource Management Plan" for the Deschutes County National Forest. It is our understanding that Governor Atiyeh has designated your agency to coordinate the various State responses. Please include the following comments into your reply to the U.S. Forest Service concerning this draft Environmental Impact Statement.

### 1. Highway Vision Clearance

Effective thinning of trees adjacent to highways is important to the safety of the traveling motorist. By leaving a buffer between the highway and timber stands, the motorist benefits in two ways: (1) fewer accidents between automobiles and deer/elk, and (2) the buffer will eliminate shady spots on the highway which allows moisture on the road surface to freeze in cold weather, causing unsafe driving conditions.

The draft Environmental Impact Statement should include this information in its policy concerning timber harvesting and management of lands adjacent to state highways.

### 2. Protecting Material Sources

Our regional office in Bend is interested in preserving the integrity of aggregate/material sources. The extraction of gravel from aggregate sites is jeopardized when conflicting uses are located close to these sites.

It is recommended that material sites be protected so that our agency and the U.S. Forest Service can utilize these mineral deposits for highway/road facilities maintenance.

H. Mike Miller  
May 14, 1986  
Page Two

Thank you for the opportunity of replying to this draft Environmental Impact Statement. Please keep our agency informed as to the status of this project and place Chuck Stevens, our Land Use Coordinator, on your mailing list. He can be reached at 378-4548.

Appendix J-118